



# EUROPEAN MARKETS DATA POLICIES<sup>1</sup>

Version: 2.0

**UNDER THE TERMS OF THE NASDAQ GLOBAL DATA AGREEMENT, CUSTOMERS OF NASDAQ INFORMATION MUST ADHERE TO THE FOLLOWING EUROPEAN DATA POLICIES. NASDAQ WILL UPDATE THESE POLICIES PERIODICALLY, AND INTERIM UPDATES WILL BE COMMUNICATED VIA NASDAQ EUROPEAN DATA NEWS:**

Nasdaq European data news: <https://www.nasdaq.com/european-markets/it-notice>

Select: Market Data – Product information

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<sup>1</sup> Full list of Policy documents available here: <https://www.nasdaq.com/solutions/european-pricing-policies>.

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# 1. DEFINITIONS

<b>Bundled Products</b>	include: pre- and post-trade data, instrument- and trading venue identifiers, MMT flags, execution- and publication- timestamps, trade types, settlement prices and price notations, calculated trade-statistics (including, high-, low-, open-, close, average values), end-of-day summaries and index values and constituents. Depending on the product, also other data types can be included.
<b>Customer</b>	means the natural or legal person who signs the Market Data Agreement and is invoiced for the Market Data fees. For the purpose of these European Data Policies, "Customer" corresponds to the definition of "Market Data Client" in Article 1(a) of Regulation (EU) No 2025/1156.
<b>Data Feed</b>	means any uncontrolled transmission of Nasdaq Information in which the Customer does not control both the entitlements and the display of the Information. API's or similar solutions are generally Data Feeds. Distributors leveraging APIs for data distribution require pre-approval from Nasdaq.
<b>Data Feed Recipient</b>	means any Recipient outside of Distributor that (a) receives Nasdaq Information from the Distributor; and (b) for which the Distributor cannot substantially control the Information for the purpose of reporting usage or qualification.
<b>Delayed Market Data</b>	means Market Data made available 15 minutes after publication, pursuant to Article 13(2) of Regulation (EU) No 600/2014.
<b>Display Data</b>	means the Market Data provided through the support of a monitor or a screen and that is human readable.
<b>Distributor</b>	means a Customer and its Affiliates, as identified in writing to Nasdaq in accordance with the Global Data Agreement.
<b>End-of-Day</b>	means Information which is available for use after official market close.
<b>External</b>	means Distribution of Nasdaq Information outside of the Customer's entity as defined by the Global Data Agreement.

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<b>External Recipient</b>	means any Recipient not affiliated with the Distributor that receives Information where the Distributor can substantially control the Information for the purpose of reporting usage or qualification
<b>Historical Data</b>	means Market Data which relates to a period prior to the previous business day which is archived and stored by the Market Data Provider.
<b>Hosted Solution</b>	means a product, solution or capability provided by a Distributor in which the Distributor makes available Exchange Information or Derived Data to an application branded or co-branded with a third-party brand for use by external Subscribers of the third-party entity or Distributor. The Distributor maintains control of the data, entitlements and display of the product, solution or capability.
<b>Information or Data</b>	means certain data or information that has been collected, validated, processed and/or recorded by Nasdaq System and made available for transmission relating to and receipt from either a Redistributor or from Nasdaq relating to: (a) eligible securities or other financial instruments, markets, products, vehicles, indicators or devices; (b) persons regulated by, or activities of Nasdaq; (c) information, data and services offered by Nasdaq from other sources; or (d) other information and data from Nasdaq. Information includes, but is not limited to, any element of information used or processed in such a way that the Information or a substitute for such Information can be identified, recalculated or re-engineered from the processed information.
<b>Managed Data Solution</b>	means distribution of a real time market data product for Subscriber or Data Feed Recipient usage in internal applications, servers, or similar services where the Distributor controls the entitlement.
<b>Market Data</b>	means the information market operators and investment firms operating a trading venue, approved publication arrangements ("APAs"), consolidated tape providers ("CTPs") and systematic internalisers publish in accordance with Articles 3 and 4, Articles 6 to 11a, and Articles 14, 20, 21, 27g and 27h of Regulation (EU) No 600/2014.
<b>Market Data Agreement</b>	means any agreement between the Market Data Provider and the Market Data Client for the provision of Market Data and reflecting the information and fees disclosed in the Market Data Policy, referred to as the "Nasdaq Global Data Agreement" or "Global Data Agreement".
<b>Market Data Policy</b>	means one or more documents from the Market Data Provider, containing information on the provision of Market Data, in accordance with Chapter V of Regulation (EU) No 2025/1156.

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<b>Market Data Provider</b>	means a market operator or an investment firm operating a trading venue, an APA, a CTP or a systematic internaliser that is engaged in a commercial activity of Market Data dissemination to clients.
<b>Nasdaq System</b>	means any system Nasdaq has developed for the creation and/or dissemination of Information.
<b>Non-Display Data</b>	means Market data which does not meet the definition of Display Data.
<b>Non-Professional Customer</b>	means a customer who does not meet the definition of Professional Customer.
<b>Post-trade Data</b>	means Trade data available after a specific trade is complete.
<b>Pre-trade Data</b>	means Order data available before a trade is complete.
<b>Professional Customer</b>	means a customer operating a regulated financial service or regulated financial activity or providing a service for third parties.
<b>Real-time Data</b>	means Market data delivered with a delay of less than 15 minutes after publication.
<b>Recipient</b>	means any natural person, proprietorship, corporation, partnership, or other entity whatsoever that has access to Nasdaq Information.
<b>Redistribution</b>	means providing a controlled or uncontrolled product.
<b>Snapshot</b>	means data Fees for per Individual Price Quote query.
<b>Subscriber</b>	means General term for receiver of data for internal usage.
<b>Website</b>	means one or more public internet uniform resource locator(s) (URL) with a single commercial brand or identity.

## 2. PRICING CLARIFICATIONS

### OVERVIEW

The clarifications below are intended to clarify certain fees within each market. The policies below are in effect unless otherwise noted on the European Markets Data price list published on <https://www.nasdaq.com/solutions/european-pricing-policies>.

Pricing Clarifications:	
Distributor Fees	<p>The Professional External Distributor Fee for a data product generally includes the Internal Distributor Fee for that data product. The Non-Professional External Distributor Fee for a data product does not include Professional Internal usage.</p> <p>Non-Professional External Distributor fee is generally included in Professional External Distributor fees.</p> <p><b>EXCEPTIONS:</b></p> <ul style="list-style-type: none"> <li>NORDIC AND BALTIC DELAYED DATA FEED RECIPIENT FEE: If the information is received in real-time and then delayed by the Distributor, the Distributor will be entitled to the information in a delayed format free of charge (see Policy Related Use Cases/Data News Clarifications).</li> </ul>
Nordic Equity	<p>Nordic Equity Norwegian (Oslo) is not currently fee-liable.</p> <p>Nordic Equity on-exchange reported trades information and Nordic Equity information from Nasdaq APA is included with the Nordic Equity Bundled Products at no additional cost.</p> <p>Spotlight Exchange data is not included with Nordic Equity products. Customers using Spotlight data from the INET Nordic Equity ITCH feed require separate approval and entitlement setup.</p>
Nordic Equity Derivatives	<p>Nordic Equity Derivatives Norwegian (Oslo) is not currently fee-liable.</p> <p>Nordic Derivatives Information from Nasdaq APA is included with the Nordic Equity Derivatives Bundled Products at no additional cost.</p>
Nordic Fixed Income	<p>Nordic Fixed Income Information from Nasdaq APA is included with the Nordic Fixed Income Bundled Products at no additional cost.</p>

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Reference & Supplementary Data	<p>An Equity TotalView-ITCH entitlement includes access to Nordic and Baltic Equity Reference Data. Equity ITCH Distributors are permitted to access the INET Nordic and Baltic Reference Data Nasdaq Data Link Files (SFTP) for no additional cost.</p> <p>Equity Derivatives TotalView-ITCH entitlement includes access to Nordic Equity Derivatives Reference Data. Equity Derivatives ITCH are permitted to access the Equity Derivatives either Nasdaq Data Link Files (SFTP) or Auxiliary Market Data (AMD) at no additional cost.</p> <p>A Fixed Income TotalView-ITCH entitlement includes access to Nordic and Baltic Fixed Income Reference Data. Fixed Income ITCH Distributors are permitted to access the Nordic and Baltic Fixed Income Reference Data in Nasdaq Data Link Files (SFTP) for no additional cost.</p> <p>Related supplementary GCF data is also included.</p>
LBMA Trade Data	<p>LBMA Trade Data enterprise licenses include derived and non-display usage for internal usage. Non-display or derived usage is not allowed for other LBMA Trade Data products.</p> <p>It is not allowed to use the LBMA Trade Data as a Benchmark or in connection with the determination of a Benchmark.</p> <p>LBMA Trade Data is not eligible for delayed pricing and will not be free after midnight</p>
Baltic CSD	<p>Baltic CSD distribution licenses include derived and Non-Display usage for internal usage.</p>
Nasdaq APA	<p>Nasdaq APA products include post-trade reporting data from publication venue MIC: 'NAPA'. (Execution venues: 'XOFF' and 'SINT')</p>
Data products with Annual billing cycle	<p>Customers eligible for this enterprise license purchase a full twelve (12) months of the license in advance, which should be paid in a single installment. After the initial period, the annual enterprise license shall automatically renew for additional periods of twelve (12) months unless notice of intent not to renew is provided by Customer, at least thirty (30) days prior to the end of the existing license; or other product specific terms are in place. Notwithstanding any other provision of the policy or the Global Data Agreement, neither Party shall have the right to terminate the service for convenience.</p>

## PRODUCT-SPECIFIC PRICE CLARIFICATIONS

Pricing Clarifications:	
Nordic Equity, Nordic Fixed Income and Nordic Equity Derivatives	Customers paying the Nordic End-of-Day Redistribution Licenses are permitted to provide the information to Subscribers using the data internally before the Midnight (Local Time) Delay Interval. Customers are required to ensure Subscribers providing the data externally before the Midnight (Local Time) Delay Interval receive prior approval from Nasdaq to become a Distributor.
Nordic Index Data	Customers paying the Nordic Index Calculation Plus License must ensure such Recipients are contractually prohibited from using Nordic End-of-day information for non-index related activities.
Baltic Index Data	Customers paying the Baltic Index Calculation License must ensure such Recipients are contractually prohibited from using Baltic End-of-day information for non-index related activities.
Nordic Equity Derivatives	Recipients of Nordic Derivatives TotalView ITCH can get access to Nordic Derivatives Auxiliary Market Data (AMD) as part of the Nordic Equity Derivatives TotalView Entitlement.
LBMA Trade Data	<p>The external distribution entitlement is only for vendors distributing the data externally.</p> <p>Any internal usage by an external distributor of LBMA Trade Data is not covered by the LBMA Trade Data Distribution License. The LBMA Trade Data Weekly product provides access to a weekly report and can be used on a Customer’s own web-site, in journals and for research.</p> <p>The reporting of LBMA Trade Data subscriber(s) for external distribution is only required for active subscribers.</p>
Danish Fixed Income Announcement file	The Danish Fixed Income Announcement file includes unlimited use of the Danish Fixed Income Announcement data in internal applications. This unlimited usage includes display use, the creation of derived data and Non-Display use in internal applications. Danish Fixed Income Announcement data is not eligible of the Delayed intervals.

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Nordic Bond Analytics	Includes unlimited use of the Bond Analytics data in internal applications. This unlimited usage includes display use, the creation of derived data and Non-Display use in internal applications. Bond Analytics is not eligible of the Delayed intervals.
Carbon Removal Data - CORC	<p>Internal enterprise license gives the right to unlimited internal use. This includes display use, the creation of derived data, and Non-Display use within internal applications.</p> <p>External distribution entitlement is for External Customers that distribute Information externally. This product provides unlimited external distribution of the data for display solutions. This entitlement also includes creating Derived data.</p> <p>Carbon Removal Data – CORC is permitted for inclusion in reports and analytical materials, as long as the original dataset is credited as the source and should consistently be cited as such.</p>

#### MEMBER-SPECIFIC PRICING CLARIFICATIONS:

<b>Member Pricing Clarifications:</b>	
Nordic Equity – Members	<p>Equity Members may receive the following information free of charge:</p> <ul style="list-style-type: none"> <li>Equity Information from the ITCH feed if the information is used as set forth in the Nordic Member Rules. (<a href="https://www.nasdaq.com/market-regulation/nordic/member-rules">https://www.nasdaq.com/market-regulation/nordic/member-rules</a>).</li> <li>Liquidity Providers on the Nasdaq Helsinki Equity Market who have signed a Liquidity Provider agreement with Nasdaq Helsinki are not fee-liable for non-display use of the Finnish Equity Information received via INET ITCH when specifically used in their liquidity providing operations.</li> </ul>
Nordic Fixed – Income Members	<p>Fixed Income Members may receive the following information free of charge:</p> <ul style="list-style-type: none"> <li>Fixed Income information from the ITCH if the information is used as set forth in the Nordic Member Rules.</li> </ul>

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Nordic Equity  
Derivatives  
Members

Nordic Equity Derivatives Information is provided via ITCH. The connection used to access Nordic Equity Derivatives Information directly from Nasdaq will alter the fee liability associated with the receipt and distribution of Nordic Equity Derivatives Information. When reviewing the associated pricing, please also refer to the [Member Rules](#) and Regulations of Nasdaq Derivatives Markets.

- Nordic Derivatives ITCH is covered by the Member Rules and allows all Nordic Derivatives Members to receive and internally distribute the Nordic Equity Derivatives Information for “Internal Usage” as defined by the Member Rules. As specified in the Member Rules all members need to sign a Global Data Agreement. Any and all other use of Derivatives Information sourced from ITCH and utilized outside of the Member Rules is fee-liable at the Nordic Equity Derivatives rates as provided in the [price list](#).
- All Members that utilize Nordic Derivatives ITCH to connect to the Nordic Derivatives Exchange will be fee-liable at the underlying rate unless the Member is otherwise excluded per the criteria below:
  - Qualifying Market Makers (QMM) are Members that sign a qualifying market making agreement with the Nordic Derivatives Exchange. QMM are defined in chapter 2, section 2.7, of the Member Rules. All Non-Display of Derivatives Information received via ITCH is not fee-liable when used as part of market making operations. Also, QMM are entitled to a reduced price on Nordic Equity NonDisplay usage related only to their market making in Nasdaq Equity Derivatives instruments.
  - Liquidity Providers (LP) are Members that sign a liquidity provider form with the Nordic Derivatives Exchange. All Non-Display of Derivatives Information received via ITCH is not fee-liable when used specifically in liquidity providing operations and other usage as specifically excluded in the Exemptions Policy.
  - Qualifying Market Makers or Liquidity Providers that are only receiving Nordic Equity Derivatives Information from Nordic Derivatives Clearing Members, and from no other source, are not fee-liable for the internal use of Nordic Derivatives Information when used as part of their Market Making or Liquidity Provider business, but the Clearing Member will be liable for the relevant external Distributor fees.
  - Market Markers that have signed a non-qualifying market making agreement will not be fee exempt as described above.

Please note the following for clarification: All usage by a QMM or LP outside of their market-making or liquidity-providing operations, including all Non-Display usage, is fee-liable at the underlying product rates. This includes, but is not limited to, the following:

- External Distribution; or
- Trading on non-Market Making accounts, or specified LP accounts, or the Member Rules; or
- High frequency trading as defined by ESMA. “Trading activities that employ sophisticated, algorithmic technologies to interpret signals from the market and, in response, implement

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trading strategies that generally involve the high frequency generation of orders and a low latency transmission of these orders to the market”. Related Trading strategies mostly consist of either quasi market making or arbitrage within very short time horizons. They usually involve the execution of trades on own account (rather than for a recipient) and positions usually being closed out at the end of the day; or

- Pre-Trade Risk Management of Sponsored Access or Direct Market Access Order Flow; or
  - LPs that do not meet the qualification criteria in the Liquidity Provider fee list for two consecutive months
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## 3. DERIVED DATA

### POLICY OVERVIEW

Derived Data Distribution – New Original Works licenses give the Customers the right to utilize real time data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq market data.

### SINGLE SECURITY DERIVED DATA POLICY

Single security derived data for **Equity- and Equity Derivatives- securities** that contain price or quote data, and is based upon a single security symbol, **and is created in whole or in part from Nasdaq Nordic and Baltic Information** will generally be fee liable at the underlying product rates.

For example: displaying a price of a single Nasdaq Nordic equity security in real-time that is comprised of prices from other trading venues is not considered to be Derived data and is fee liable at underlying real-time subscriber product rates. Examples of single security data that are not considered to be Derived Data and are fee liable at the underlying product rates include (but are not limited to):

- Displaying the price of a security near or at the inside
- Equity curves
- Alert messages with prices
- Binary options data
- Indicative equity quotes
- Analytical or graphical representations with prices
- Alerts that meet preset criteria set by the Subscriber
- Contracts for Difference (CFD)
- Display of auto-quotes

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- Price valuations for individual securities
- Spread transactions & spread based derivative instruments
- Use of Nordic margin price data to create a derived data product

The use cases of single security Derived Data that will be considered as derived and not liable for the underlying product rates are:

- Certain Trading Platform publications: See below section: Trading Platform Derived Data Policy
- Derived Data used for Net Asset Value [NAV] calculations for funds listed on Nasdaq Nordic is not fee-liable
- Derived Data used for calculations for ETP/ETN and similar instrument types listed and traded exclusively on Nasdaq Nordic exchanges is not fee-liable
- Calculating Volume Weighted Average Price (“VWAP”) – where a Customer or SI takes Nordic data and uses volume and share price parameters to calculate VWAP – used to measure average price weighted by volume. From the VWAP value, it is not possible to reverse engineer the price, or the volume
- Signal creation - where a Customer uses data in real-time to create signals like buy/sell indicators, graphical representation of buy/sell indicators, charts and other non-price related graphical representations
- Internal usage of Nasdaq LBMA Derived Data is not fee-liable with a Nasdaq LBMA enterprise license. Nasdaq LBMA derived data is not fee-liable when distributed to controlled terminals of Nasdaq LBMA data, but where used outside a controlled terminal, it requires a separate Nasdaq LBMA enterprise license. For all other Nasdaq LBMA products derived data is not allowed
- An index future instrument derived from an index will follow index derived policy.

If your firm is unsure about a specific use case, please submit your use case to your Nasdaq Representative for a determination.

## MULTIPLE SECURITY DERIVED DATA POLICY

Multiple security Derived Data that contains price data and is not based upon a single security symbol will generally not be fee liable at the underlying product rates, and Customers will be liable for the relevant Derived Data fee.

Examples include:

- Portfolio valuation: creation of the asset value of a portfolio of securities (multiple securities). Examples include, but are not limited to: Mutual Fund Valuations (NAVs), or Hedge Fund Valuations
- Creation of prices for certain products that contain multiple security information, such as derivatives based on combinations of multiple securities where the underlying single security price information cannot be reverse engineered

For Nordic Equity, Nordic Fixed Income, Nordic Equity Derivatives and Baltic Equity and Fixed Income; Derived Data Fees do not include the right to create real-time indexes. If using the data to create real-time indexes, only the Index calculation fees would apply. If used for both Derived Data and indexes, then both fees would apply.

If your firm is unsure about a specific use case, please submit your use case to your Nasdaq Representative for a determination.

**MARKET PLATFORM DERIVED DATA POLICY**

A Market Platform operator is liable for a fee if the data used is sourced from Nasdaq either directly or indirectly via a data vendor. If a trading platform receives data from multiple sources including Nasdaq, it is required to have entitlements, controls, and mechanisms to demonstrate how the data is utilized for pricing and quoting.

Examples of derived usage – note that this list is not exhaustive and does not limit what Nasdaq will consider to be fee liable at the underlying product rates or Market Platform fee including display fees:

- Delaying a quote insignificantly is not considered to be Derived Data. All data delayed with less than 15 minutes is considered to be real-time data
- Altering the volume of a quote, but keeping the same price is not considered Derived Data, for example the Nasdaq volume is 100 shares, but Trading Platform offers 10 shares
- Adding small amounts of decimals that marginally alter a quote is not considered to be Derived Data
- Random calculations that affect the quote marginally are not considered to be Derived Data
- Using a price of a single Equity- or Derivatives- security in real-time that is comprised with prices from other trading venues is not considered to be Derived data

**Non-Display usage:**

When a Market Platform uses Nasdaq market data for best execution checks, or for order routing purposes, the Market Platform operator will be included with one of the customer categories relevant for Market Platforms, i.e. Trading Venue, or Financial Institutions with Systemic Internalisation.

A Market Platform license grants the Customer, in its capacity as a Systematic Internaliser (SI), the right to derive a quote using relevant Data, provided such use is in accordance with applicable SI quote requirements under the MiFID II/MiFIR regulatory framework.

**DERIVED DATA CLARIFICATIONS**

Service Level/Details	Description
Nordic Equity	The Nordic Equity Derived Data Distribution – New Original Works license gives the Customer the right to utilize Nasdaq Nordic Equity real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products

	provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Nordic Equity market data.
Baltic Equity & Fixed Income	The Baltic Derived Data Distribution – New Original Works license gives the Customer the right to utilize Nasdaq Baltic real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Baltic market data.
Nordic Fixed Income	The Nordic Fixed Income Derived Data Distribution - New Original Works license gives the Customer the right to utilize Nasdaq Nordic Fixed Income data to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Nordic Fixed Income market data.
Nordic Equity Derivatives	The Nordic Equity Derivatives Derived Data Distribution - New Original Works license gives the Customer the right to utilize Nasdaq Nordic Equity Derivatives real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided the new original works cannot be reverse engineered in any way back to the underlying Nasdaq Nordic Equity Derivatives market data.
Nordic Fixings	<p>The Nordic Fixings Enterprise License gives Customers the right to utilize Nordic Fixings data to derive new original works based on multiple securities for unlimited distribution to uncontrolled products provided the new original works cannot be reverse engineered in any way back to the underlying Nordic Fixings market data.</p> <p>The External Distributor Nordic Fixings Enterprise License fee covers both internal and External derived usage.</p> <p>The Internal Distributor Nordic Fixings Enterprise License fee covers internal derived usage only.</p>
LBMA Trade Data	<p>Internal usage of derived LBMA Trade Data is free of charge with a LBMA Trade Data enterprise license. LBMA Trade Data derived data is free when distributed to controlled terminals of LBMA Trade Data, but were used outside a controlled terminal, it requires a separate LBMA Trade Data enterprise license. For all other LBMA Trade Data products derived data is not allowed.</p> <p>LBMA Trade Data average price used in the LBMA Trade Data VIPT offering shall not without prior written consent be used:</p> <ol style="list-style-type: none"> <li>1. As reference for the issuance of a financial instrument;</li> <li>2. As reference for the determination of the amount payable under a financial instrument or a financial contract;</li> <li>3. As reference by a party to a financial contract;</li> <li>4. For measuring the performance of an investment fund for the purpose of tracking the return of the precious metal markets, of defining the asset allocation of a portfolio, or of computing the performance fees;</li> </ol>

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	ny other purpose which may qualify LBMA Trade Data average price used in the LBMA Trade Data product as a benchmark in accordance with regulation (EU) 2016/1011 of the European Parliament and the European Council on indices used as benchmarks in financial instruments and financial contracts.
Nasdaq Sustainable Bond Network	Nasdaq Sustainable Bond Network Data – Derived Data License and Investor Portal Premium Access: Gives the right to utilize Nasdaq Sustainable Bond Network Data to derive new original works for unlimited distribution to controlled products provided the new Bond Network Data. Original works cannot be reverse engineered in any way back to the underlying Nasdaq Sustainable Bond Network data.
Nasdaq APA	The Nasdaq APA Derived Data Distribution – New Original Works license gives the Customer the right to utilize Nasdaq APA real time price/volume data (pre- & post trade) to derive new original works based on multiple securities for unlimited distribution to controlled products provided, the new original works cannot be reverse engineered in any way back to the underlying Nasdaq APA market data.
Carbon Removal Data - CORC	Derived data is authorized for inclusion in composite reports and analytical materials, provided that the original dataset is acknowledged as the source and should therefore always be cited as the data source.

- Derived Data used for Net Asset Value [NAV] calculations for funds listed on Nasdaq Nordic is not fee-liable.
- Customers are not permitted to use the Nordic Margin Price Data to create a Derived Data product.
- For Nordic Equity, Nordic Fixed Income, Nordic Equity Derivatives, and Baltic; Derived Data rights does not by default include the right to create indexes. A Customer that creates indexes using real time data must be in a Customer Sub-group that includes index creation.
- Derived Data used for calculations for ETP instruments listed and traded exclusively on Nasdaq Nordic exchanges is not fee-liable.

## 4. NON-DISPLAY USAGE

### OVERVIEW

Non-Display usage is any method of accessing Exchange Information other than Display Usage. Non-Display Usage is a means of accessing Nasdaq data that involves automated access or use by a machine, without access or use of a Display by a natural person or persons.

Devices used in the transportation, dissemination or aggregation (collectively, “distribution”) of data are not necessarily fee-liable, but the Customer should be able to identify such Devices that exist within the market data infrastructure and how many Devices are used for distribution, separate and apart from Devices that are used for other purposes, as illustrated by the examples below. The Unit of Count for Non-Display products are per Customer.

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## NORDIC & BALTIC NON-DISPLAY

Categories applicable per asset class product:

- **Non-Display Non-trading activities:** Covers non-trading and non-display activities for the purpose of calculation and verification such as but not limited to: portfolio valuation, administration, risk calculations, analysis, and fund management.
- **Non-Display Trading activities:** Covers a firm's Non-Display trading-based activities as trading firms and for the purpose of customer business facilitation. It also includes order routing, fully automated trading, and trading with manual intervention. Additionally, it includes Non-Display non-trading activities usage outlined above.

## NORDIC & BALTIC TRADING PLATFORM

Trading platform policies applies to Customers operating a trading platform such as buy- and/or sell-side, multilateral trading facilities (MTF), organized trading facilities (OTF), regulated market (RM), dark pools, dark orderbooks, frequent batch auctions (FBA), auction on demand (AOD), block trade facilities, broker crossing networks, systematic internalisation systems (SI), , alternative trading systems and crossing networks. These are liable for trading platform fees per asset class of data.

Trading platform belong to one of the following customer sub-groups per asset class product:

- **Market Platform Premium and Market Platform Advanced sub-groups:** Covers the use of real-time data for the organisation and operation of markets, regardless of whether buy-side and sell-side interests are coordinated on a bilateral or multilateral basis. This encompasses Multilateral Trading Facilities (MTFs), Organised Trading Facilities (OTFs), as well as comparable alternative trading systems, dark pools, and crossing networks. This also includes the right to use real-time data to operate SI
- **Market Platform Basic and Market Platform Standard sub-groups:** Covers the use of real-time data for the organisation and operation of markets, regardless of whether buy-side and sell-side interests are coordinated on a bilateral or multilateral basis. This encompasses Systematic Internalisers (Sis).

## NORDIC & BALTIC NON-DISPLAY USE EXCLUSIONS

Non-Display does not include any use of Nasdaq Nordic or Baltic information that merely enables a display, and results in the output of Nasdaq Nordic information solely to a display. Examples include, but are not limited to:

- An application that is updating a portfolio and exposing such information on the display is not considered Non-Display
- Calculating VWAPs or other derived information for use in a Display is not considered Non-Display, however a derived license may apply

## NORDIC FIXING NON-DISPLAY

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Non-display usage of Nordic Fixings is part of the Nordic Fixings Enterprise License fee.

## **NORDIC EQUITY DERIVATIVES NON-DISPLAY**

All Nordic Equity Derivatives Non-display usage is fee liable. The only exception is for Market Makers and Liquidity providers as stated in the Nordic Derivatives Members section under Pricing Clarifications in this document.

## **OTHER NON-DISPLAY QUESTIONS**

If your firm is unsure about a specific use case, please submit your use case to your Nasdaq Representative for a determination at any time. For avoidance of doubt, Non-Display is fee-liable regardless of whether the Order Management System, Execution Management System, or trading infrastructure is:

- A virtual system or located in the cloud;
- Installed locally within a data center;
- Enterprise; or
- Locally on an individual's desktop or Device.

If your firm utilizes Nasdaq Information in accordance with the Non-Display clarification above, please contact Nasdaq.

## 5. DELAYED DATA

### OVERVIEW

Nasdaq permits Customers to delay certain Information. In general, use of Nasdaq Nordic & Baltic Delayed data is free, however external distribution of eligible Delayed products where the data is distributed for a fee, including a general fee for accessing services, is fee liable. External distribution of Delayed data should be understood as the selling of Delayed data in unchanged form to third parties, either directly by charging when giving access to that data, or via a general access fee.

Where a Customer publishes Delayed data on a website, but does not directly charge for that access, it is not considered re-distribution and no re-distribution fee applies.

Where a Customer uses Delayed information in the creation of value-added services that are then re-distributed for a fee, fees will apply. Value-added services should be understood as the creation of a product made on the basis of Delayed data, for example through aggregating data sets across different sources or creating a historical series, or combining it with other information, and offering it as a product to third parties. Only those value-added services which are sold as a product for a fee to third parties should be considered as value-added services and will therefore be subject to a fee.

For Customers providing Delayed Information to Data Feed Recipients where the Delayed data is distributed as part of a commercial service; or value-added service, Nasdaq requires the Customer to sign a Global Data Agreement. Equally, if a Customer sources Nasdaq Delayed information from the Nasdaq website and externally distributes it as part of a commercial or value-added service, Nasdaq requires the Customer to sign a Global Data Agreement.

For Customers providing Delayed Information – regardless of whether the usage is fee liable- Nasdaq requires that an appropriate delay message be provided to Subscribers, including wall boards, tickers, mobile devices and audio announcements on voice response services. The delay message must prominently appear on all displays containing Delayed Data, such as at or near the top of the page. In the case of a ticker, the delay message should be interspersed with the market data at least every 90 seconds.

Examples of appropriate delayed messages are as follows:

- “Data Delayed 15 minutes”
- “Data Delayed 24 hours”
- “Del-15”, “Data Delayed until Midnight CET”

**DELAY INTERVALS**

The delay interval is a period of time after which Information becomes Delayed Information, as specified by Nasdaq. Please refer to the following page for the Delay Intervals for each data product. Some products are eligible for a Delay Interval, and after such time the data may be fee-liable or free, depending upon the product. Note that products that are listed as not eligible for a Delay Interval below will incur the relevant real-time fees.

Data Type	Description
Real-Time Information	Information disseminated prior to the Delay Interval.
Delayed Information	<p>Information disseminated after the Delay Interval. Nasdaq currently recognizes the following delay Intervals, which apply to individual products:</p> <ul style="list-style-type: none"> <li>• 15 minutes</li> <li>• 24 hours</li> <li>• Midnight Local Time (local time 11:59:59 PM where the information is released)</li> <li>• Not Eligible for Delayed Pricing</li> </ul> <p>Note the Midnight Local Time refers to the time zone where the Information is originally distributed from Nasdaq.</p>
End-of-day Information	Information from the current day that is disseminated after the market has closed for the current day and after the Delay Interval (unless otherwise noted).

REAL-TIME DATA	<ul style="list-style-type: none"> <li>• Data Disseminated prior to the Delayed Timeframe for any product</li> <li>• Prior Approval Required for Uncontrolled Products</li> </ul>
DELAYED TIMEFRAME: 15 MINUTES	<ul style="list-style-type: none"> <li>• Data Disseminated at least 15 minutes after Nasdaq releases the information</li> <li>• Prior Approval Required for some products, see below</li> </ul>
DELAYED TIME FRAME: MIDNIGHT LOCAL TIME [Time-Zone Specific]	<ul style="list-style-type: none"> <li>• Data Disseminated after midnight local time [11:59:59 PM] where the information is released</li> <li>• No Prior Approval Required for Uncontrolled Products , see Product Specific Notes below for exceptions</li> </ul>
DELAY TIMEFRAME: 24 HOURS	<ul style="list-style-type: none"> <li>• Data Disseminated at least 24 hours after Nasdaq releases the information</li> <li>• No Prior Approval Required for Uncontrolled Products , see Product Specific Notes below for exceptions</li> </ul>
DELAY TIMEFRAME: END-OF-DAY	<ul style="list-style-type: none"> <li>• Data Disseminated after market close on the day Nasdaq releases the information <b>and</b> after the Delayed Data Timeframe for the associated product</li> <li>• No Prior Approval Required for Uncontrolled Products , see Product Specific Notes below for exceptions</li> </ul>

A Customer may systematically delay certain information per the specified Delay Interval after which the distribution of the Information may not be fee-liable and may not need to be reported to Nasdaq on a monthly basis. Product specific information is provided below.

### PRODUCTS THAT CAN BE DELAYED BY 15 MINUTES

Nasdaq permits Customers to delay certain components of the Information. Components of the Information that may be delayed are listed below. Internal usage of these products with no external distribution is not fee liable.

In general, external distribution of eligible delayed products where the data is distributed for a fee, including a general fee for accessing services, is fee liable. External distribution of Delayed data should be understood as the selling of Delayed data in unchanged form to third parties, either directly by charging when giving access to that data, or via a general access fee.

Where a Customer publishes Delayed data on a website, but does not directly charge for that access, it is not considered re-distribution and no re-distribution fee applies.

Where a Customer uses Delayed information in the creation of value-added services that are then re-distributed for a fee, fees will apply. Value-added services should be understood as the creation of a product made on the basis of Delayed data, for example through aggregating data sets across different sources or creating a historical series, or combining it with other information, and offering it as a product to third parties. Only those value-added services which are sold as a product for a fee to third parties should be considered as value-added services and will therefore be subject to a fee.

For the avoidance of doubt, the products that can be delayed by 15 minutes are:

Product	Product Description	Delay Interval	What can be delayed?
<b>Nordic Equity</b>	Nordic Equity Level 1	15 Minutes	One level of market by price depth pre-trade data (price and volume), post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price notations. For redistribution of delayed index data and Nasdaq-calculated statistics a Nordic Delayed Bundled Data Redistributor license is required.
	Nordic Equity Level 2	15 Minutes	Five levels of market by price depth pre-trade data (price and volume), post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price notations. For redistribution of delayed index data and Nasdaq-calculated statistics a Nordic Delayed Bundled Data Redistributor license is required.
	Nordic & Baltic Equity Last Sale	15 Minutes	Post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price notations.

<b>Baltic Data</b>	Baltic Equity & Fixed Income Level 1	15 Minutes	One level of market by price depth pre-trade data (price and volume), post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price notations. For redistribution of delayed index data and Nasdaq-calculated statistics a Baltic Delayed Bundled Data Redistributor license is required.
	Baltic Equity & Fixed Income Level 2	15 Minutes	Five levels of market by price depth pre-trade data (price and volume), post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price notations. For redistribution of delayed index data and Nasdaq-calculated statistics a Baltic Delayed Bundled Data Redistributor license is required.
<b>Nordic Equity Derivatives</b>	Nordic Equity Derivatives Level 2	15 Minutes	Five levels of market by price depth pre-trade data (price and volume), post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price notations. For redistribution of delayed Nasdaq-calculated statistics a Nordic Delayed Bundled Data Redistributor license is required.
	Nordic Equity Derivatives Norwegian (Oslo) Level 2	15 Minutes	All
<b>Nordic Fixed Income</b>	Nordic Fixed Income	15 Minutes	Five levels of market by price depth pre-trade data (price and volume), post-trade price data, instrument- and trading venue identifiers, MMT flags, execution- and publication-timestamps, trade types and price

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			<p>notations. For redistribution of delayed index data and Nasdaq-calculated statistics a Nordic Delayed Bundled Data Redistributor license is required.</p> <p>No Nasdaq-calculated analytics or calculated prices are eligible for delayed distribution. Please be advised that trade types “OTC-Loan Payment” and “OTC-Primary Transaction” are <b>not</b> considered transaction data and are <b>not</b> included in the delayed interval.</p>
<b>Nasdaq APA</b>	Trade report data from Nasdaq APA.	15 Minutes	Trade reports.

Prior approval is required for Customers providing the above-mentioned delayed Information for a fee, including a general fee for accessing services, or for Distributors using the data in the creation of value-added services. Nasdaq requires the Customers to sign a Global Data Agreement and to report the total number of Delayed Data Recipients on a monthly basis.

### OBLIGATION TO MAKE MARKET DATA AVAILABLE FREE OF CHARGE 15 MINUTES AFTER PUBLICATION

In compliance with Articles 64 and 65 of MiFID II and Article 13 of MiFIR, Nasdaq provides free and easily accessible access to Delayed data for regulated products on the Nasdaq website. Information on how to download the data can be found on the following page: <https://www.nasdaq.com/solutions/mifid-ii-delayed-data>. Post-trade files contain all the relevant fields for the purpose of post-trade transparency, including the relevant flags. Pre-trade data files include the current best bid and offer prices available, along with the depth of trading interest at those prices. Prior approval is required for Customers wishing to take data from the website and distribute it for a fee, including a general fee for accessing services. Prior approval is also required for Customers wishing to take the data from the website and use it in the creation of value-added services.

### PRODUCTS THAT CANNOT BE DELAYED BY 15 MINUTES

The following products are not eligible for the delayed data policies, nor the obligation to make data available free of charge 15 minutes after publication. Delay eligibility can be found in column “Delay Interval” below:

Product	Product Description	Delay Interval
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<b>Nordic Equity</b>	Nordic Equity TotalView	Not Eligible
	VINX All	Not Eligible
	Nordic Equity ITCH Glimpse	Not Eligible
	Nordic Equity End-of-Day Files	Midnight LT
<b>Baltic Data</b>	Baltic Equity & Fixed Income TotalView	Not Eligible
	Baltic Corporate Actions Weekly	Not Eligible
	Baltic End-of-Day Equity & Fixed Income	Midnight LT
	Baltic End-of-Day Fund List	Midnight LT
	Baltic End-of-Day Files	Midnight LT
	Baltic Equity Reference Data	Midnight LT
	Tallinn and Riga Fixed Income News	15 Minutes
	Baltic CSD	Not Eligible
<b>Nordic Equity Derivatives</b>	Nordic Equity Derivatives TotalView	Not Eligible
	Nordic Derivatives ITCH Glimpse	Not Eligible
	Nordic Equity Equity Derivatives End-of-Day Files	Midnight LT
<b>Nordic Fixings</b>	Nordic Fixings	Midnight LT
<b>Nordic Fixed Income</b>	Nordic Fixed Income Bond Analytics	Not Eligible
	Nordic Fixed Income End-of-Day files	Midnight LT
<b>Nordic Historical Data</b>	Nordic Historical View	Not Eligible

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<b>Nordic Reference Data</b>	Nordic Equity Reference Data Files	Not Eligible
	Nordic Fixed Income Reference Data Files	Not Eligible
	Nordic Equity Derivatives Reference Data Files	Not Eligible
	Nordic Index Reference Data Files	Not Eligible
<b>LBMA Trade Data</b>	LBMA Trade Data - Weekly	Not Eligible
	LBMA Trade Data Daily	Not Eligible
<b>ESG Data Matter</b>	ESG Data Matter	Not Eligible
<b>Carbon Removal Data - CORC</b>	Carbon Removal Data - CORC	Not Eligible

#### DATA FEED AGREEMENTS: END-OF-DAY DATA FEEDS

Customers that provide End-of-Day Information, held until after the Delay Interval, if applicable, on an Uncontrolled Product are not currently required to obtain a Nasdaq Global Data Agreement from such Data Feed Recipients. Nasdaq's waiver of the agreement requirements does not limit the Customer's indemnification obligations as per the [Nasdaq Global Data Agreement](#).

#### PRODUCT SPECIFIC NOTES:

Product	Note
<b>Baltic Equity &amp; Fixed Income</b>	The Midnight (Local Time) Delay Interval applies only to External distribution of Baltic End-of-Day reports received from Nasdaq and distributed in their entirety; partial extracts of such Baltic End-of-Day reports may be distributed prior to midnight Local Time free of charge; Baltic End-of-Day reports may be created by the Customers from underlying data sets and distributed prior to the corresponding Delay Interval free of charge.

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**Nordic Fixed Income**

The only components of the Nordic Fixed Income product that are eligible for delayed distribution are the intraday pre- & post trade data.

## 6. DISTRIBUTOR FEES

### NASDAQ NORDIC & BALTIC HISTORICAL DATA

The Subscriber has the right to save Nordic and Baltic Historical Data on their own computer, to process it, and to employ it for internal use only. The Subscriber is not permitted to forward the Nasdaq Market by Level Nordic and Baltic Historical Data with more than five levels of market by price depth pre-trade data and trades to third parties, or to display it on public access media such as the Internet.

The Midnight (Local Time) Delay Interval applies only to External distribution of Baltic End-of-Day reports received from Nasdaq and distributed in their entirety; partial extracts of such Baltic End-of-Day reports may be distributed prior to midnight local time free of charge; Baltic End-of-Day reports may be created by the Customer from underlying data sets and distributed prior to the corresponding Delay Interval free of charge.

## 7. NATURAL USER POLICY

### OVERVIEW

Reporting of Natural Users (“netting”) is available to Customers who have met the criteria and have been formally approved in writing by Nasdaq. Reporting of Natural Users allows approved Customers to:

- Directly Report all Display Subscribers regardless of the source of the data;
- Adopt a User based Unit of Count for Display Usage reporting and subsequent payment of fees to Nasdaq

Unit of Count for Natural Users can be reported to Nasdaq for Customer’s internal Display Usage, for the following Subscriber products:

**Products:**

Nordic Equity

Nordic Fixed Income

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Nordic Equity Derivatives

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Baltic Equity & Fixed Income

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## NATURAL USER CRITERIA

The below acceptance criteria must be met and maintained by a Customer that reports Natural Users:

- Executed the [Global Data Agreement](#)
- Complete the Nasdaq European *Natural User Request Form* (as provided by Nasdaq Data Operations)
- Agree to direct billing by Nasdaq for all Nasdaq products listed above (for which the Customer has access). Billing will apply across the Customer's entire organization, including affiliates. Nasdaq will bill for all services on one billing account. If separate billing accounts are requested, Customer will be required to pay multiple distributor fees across each billing account.
- Customers must demonstrate adequate internal controls for entitlements and monitoring, and controls for the reporting of all vendor-reported Display Use as well as any internal Display Use.
- Customers must submit the Natural User Reporting file in the required format starting from the month approved by Nasdaq (and ongoing). Amendments or edits to the Natural User Reporting file format are prohibited. In cases where participants amend or edit the file format, they will be billed for all Subscribers (e.g. Not for Natural Users).

## ACCEPTANCE FOR REPORTING NATURAL USERS

- After meeting the above acceptance criteria, Nasdaq will provide the Customer with an approval letter confirming their acceptance to report Natural Users. The start date will always be at the commencement of a calendar quarter (mutually agreed upon) and communicated in the approval letter.
- An approval letter will be issued by Nasdaq to the vendors that provide data to the Customer at the time of acceptance in to reporting Natural Users. Customer must notify Nasdaq of any new vendors such that Nasdaq may inform them. In most cases, vendors require Nasdaq to provide 90 days' notice and as such, the effective date for billing will only commence once each vendor reports Customer's usage as non-billable.

## OBLIGATIONS FOR CUSTOMER REPORTING NATURAL USERS

- Customers are required to submit the Natural User Reporting File report to Nasdaq monthly. The report is due on the 15th day of the month following the service month. The report will be rejected if it is not submitted in the required format for Natural User Reporting Files.

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- Customers must report the number of Natural Users via the Natural User Reporting File and the Nasdaq reporting system (*Data-Client Portal*) by using one Nasdaq billing account number as stated in the file. Nasdaq will issue only one monthly invoice to Customers. All Customers reporting Natural Users shall continue to comply with all other terms and conditions as published in European Data Policies.
- The reporting start date is the first day in the service month in which the product or service is capable of being accessed by a User. Customers will start reporting the number of Display Subscribers before the 15th of the month following the service month. Subscribers of a Customer that report relevant Natural Users that are billed by a Vendor should be excluded from the count of Subscribers reported to Nasdaq via Data-Client Portal. Customers reporting Natural Users should work with Vendors to move those Subscribers to non-billable codes.
- Customers reporting Natural User(s) must maintain payment of all other fees, including applicable fees for their Customer category. Customers reporting Natural User(s) for Nordic Equity, Nordic Fixed Income, Nordic Equity Derivatives and Baltic Equity & Fixed Income products will pay the Professional per Natural User, Pre-trade Data Natural User and Post-trade Data Natural User fees as applicable for their Professional Display Usage. Customers reporting Natural User(s) for their MDS Display with Non-Display Access will pay the Natural User fees.
- Customers reporting Natural User(s) must keep adequate records to demonstrate that the particular unit should be considered to be a Natural User.
- Customers reporting Natural User(s) must include contact information for all contracting parties, such as vendors.

#### **BILLABLE AND NON-BILLABLE GUIDELINE FOR NATURAL USERS**

- Customers are to report all Billable and Non-Billable Subscribers and associated instances in the European Natural Users Reporting File as Billable Users.
- Systems may be in the European Natural Users Reporting File but should be reported as Non-Billable.

#### **VENDOR REPORTING OF NATURAL USERS**

Vendors for the purposes of this document shall refer to Distributors of Nasdaq Information that have executed a Global Data Agreement with Nasdaq. Vendors are also known as market data Vendors.

- Customers Display Usage through a Vendor should be covered only to the extent Nasdaq has informed the Vendor of Natural Users (see section on Acceptance).
- Vendor shall then be instructed by Customers to report all Subscribers receiving Information that qualifies as Natural Users to Nasdaq under a non-billable code.
- Vendor-reported Display Usage submitted on behalf of Customers must continue to abide by the Nasdaq Requirements, including the submission of both Summary and Detailed usage reporting to Nasdaq on a monthly basis (see Nasdaq Reporting Policy document). Vendors that fail to provide Nasdaq the associated reporting for a Customer may be reason for Nasdaq to decline the Natural User Reporting File.

## TERMINATION OF NATURAL USER REPORTING

- In case of termination of reporting of Natural Users Customers are required to notify Nasdaq in writing at least ninety (90) days prior, with expiry effective at the end of a calendar quarter. Additionally, Customers that report Natural Users must notify their vendors to begin billing and reporting them for all European Information. Confirmation of these requirements must be shared in writing to Nasdaq prior to the Customer stopping reporting of Natural Users. Nasdaq will bill the applicable Subscriber usage directly to Customer until vendor reporting is updated. Nasdaq may deny reporting of Natural Users if the Customer fails to provide a timely Natural User Reporting File each month.
- Upon termination of reporting of Natural users by the Customer, the Customers must provide Nasdaq with a comprehensive list of Vendor reported Subscribers that were reported as non-billable on their behalf. Additionally, Customers that report Natural Users shall provide each such vendor with a written notification indicating the end date of the Program; such notice must also be sent to Nasdaq.

## AUDIT

In compliance with applicable law, Nasdaq has the right to examine the books and records of Customers reporting Natural Users. Adequate record keeping and controls must be in place to be admitted to report Natural Users. Customers are liable for any underreported usage, or usage that is not captured during the Recipients netting process. Nasdaq has the right to inspect the process and systems for reporting Natural Users prior to the acceptance from Nasdaq to report Natural Users.

## OTHER NOTES ON REPORTING OF NATURAL USERS

NOTE 1: Non-Display usage is not covered under this policy NOTE 2: Nordic and Baltic member firms that report Natural Users who have Users currently reported as non-fee liable per the Trading Cycle must report these users as Billable in order to report Natural Users.

## 8. UNIT OF COUNT TERMINOLOGY

### OVERVIEW

Except where specifically detailed otherwise in this policy document, distribution of Nasdaq Information is to be measured, controlled and recorded by using the Interrogation Device or Subscriber as the Unit of Count.

Terminology	Definition	Unit of count
Subscriber also referred to as Interrogation Device, Device, or Access	A device, computer terminal, automated service, or unique user identification and password combination that is not shared and prohibits simultaneous access, and which is capable of accessing Nasdaq Information; "Interrogation Device," "Device" or "Access" have the same meaning as Subscriber. For any device, computer terminal, automated service, or unique user identification and password combination that is shared or allows simultaneous access, Subscriber shall mean the number of such simultaneous accesses	The Number of physical Devices or the Number of Unique User IDs and Password combinations that are not shared by multiple people, and cannot simultaneously log-on with multiple instances or to multiple Devices  Customers are to report the total number of Subscribers with the potential to access the Information, unless the Customer is able to technically track actual usage for each Subscriber
Per Query	Retrieval by a Subscriber of Nasdaq Information that is updated by an action on the part of the Subscriber; each unrequested or pushed update of price(s) or quote(s) must be recorded (see Pricing clarifications above for additional details)	Any displayed quote requested or pushed
Data Feed	Any uncontrolled transmission of Nasdaq Information in which the Customer does not control both the entitlements and the display of the Information. All API's or similar solutions are a Data Feed, unless Nasdaq pre-approves such API distribution under an alternative Unit of Count.	The number of Data Feed Recipients

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User	A natural person that receives Exchange Information	Each natural person
Website	One or more public internet uniform resource locators (URL) with a single commercial brand or identity	Each unique Website with access to Nasdaq Information. Nasdaq reserves the right to determine whether any URL or group of URLs should be regarded as separate Websites for fee purposes
Unique Devices or Per Device	The number of unique Devices accessing a website or mobile application. Customers restricting access to the Customer’s service may not report on a “per Device” basis; they must select either “per user” or “per query”. Access restriction refers to restrictions on content, not simply a username and password requirement (please speak with your Nasdaq representative for additional detail)	The number of “Unique Devices” (Reporting methodologies in counting Devices must be approved in advance by Nasdaq)
Display Usage	Any method of accessing Exchange Information that involves the display of such data on a screen or other mechanism designed for access or use by a natural person or persons	
Custody Account	Number of accounts that the Member has that are available for trading or viewing	“Per Custody Account” pricing requires the Customer to report each Subscriber with an active custody account with the Member
Active Subscriber	Custody Accounts accessed each month by a Subscriber	Customers are to report snapshot Subscribers that access the Custody Account of the Member’s Service within a particular calendar month
Subscriber Firm	The total number of firms with Non-Professional Subscribers plus the number of firms with Professional Subscribers accessing the Information	The number of Subscriber Firms

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Natural User	A User with one or more Access IDs with one or more Information Suppliers.	<p>Each User with one or more Access/User ID.</p> <p>Customers are to report the total number of Natural Users.</p> <p>Natural User fees will apply to all Internal Use of the Customer.</p> <p>Where a Device cannot be allocated to a natural person, each natural person with potential access must be reported; or per Subscriber reporting is required.</p>
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## 9. UNIT OF COUNT: SYSTEM CLASSIFICATIONS

### OVERVIEW

The Unit of Count may differ, depending upon the information received and the method of distribution. Please use the below guidelines for submitting Units of Count, Reportable Units or similar to Nasdaq. All Units of Count used by a Customer or a Customer's Group must be identified in the Nasdaq System Application. Customers are entitled to freely select the unit of count according to their preference among the options offered by Nasdaq. Nasdaq recognizes the following types of System Types or Applications.

### UNIT OF COUNT: UNCONTROLLED PRODUCTS

An Uncontrolled Product is defined by Nasdaq as any uncontrolled distribution of Nasdaq Information to Subscribers. If the Customer cannot control both the entitlements and the display of the Information, then the system will be considered an Uncontrolled Product.

#### **NASDAQ CURRENTLY OFFERS THE FOLLOWING UNCONTROLLED PRODUCTS FOR EUROPEAN MARKETS:**

- UP1. Data Feed
- UP2. Nordic & Baltic Managed Data Solutions [MDS]

### UNIT OF COUNT: CONTROLLED PRODUCTS

A Controlled Product is defined by Nasdaq as any controlled distribution of Nasdaq Information to Subscribers. If the Customer controls both the entitlements and the display of the Information, then the system will be considered a Controlled Product.

#### **NASDAQ CURRENTLY OFFERS THE FOLLOWING CONTROLLED PRODUCTS:**

- CP1. Subscriber [Controlled Device/Access]
- CP2. Hosted Solution: Select Nordic & Baltic Data

## THE UNCONTROLLED AND CONTROLLED PRODUCTS ARE DESCRIBED IN THE FOLLOWING SECTIONS

### A. UP1. DATA FEED

Data Product	Type Offered
All Nasdaq Information	Display or Non-Display

A Data feed is defined by Nasdaq as any uncontrolled distribution of Nasdaq Information. Any firm receiving a Data feed (Recipient) is recognized as a Customer by Nasdaq.

All Data Feeds — including internally or externally distributed, real-time or delayed, snapshot or streaming, Direct or Indirect — must be approved by Nasdaq prior to initiation of service. This approval process creates a direct relationship between the Recipient and Nasdaq. This direct relationship is essential to ensuring the correct display of the information, an effective entitlement process and a timely reporting process of the market data usage. After Customers are granted permission to provide Data feeds, each individual Recipient of a Data feed must be approved as well. If a Distributor provides data to an unapproved Recipient or releases information prior to approval, the Customer is responsible for paying the Recipient's fees and charges associated with this data during the unauthorized timeframe.

EXCEPTIONS: NORDIC & BALTIC DELAYED DATA FEED: See the Delayed Data section of this document for further details.

## B. UP2. NORDIC & BALTIC MANAGED DATA SOLUTIONS [MDS]

Data Product	Type Offered
NORDIC EQUITY	Professional: Display or Non-Display
NORDIC EQUITY DERIVATIVES	
BALTIC EQUITY & FIXED INCOME	Non-Professional: Display

### OVERVIEW

Distribution of a Nasdaq Nordic- or Baltic real time market data product for Subscriber or Data Feed Recipient usage in internal applications, servers, or similar services where the Distributor controls the entitlement.

Customers offering Managed Data Solutions must:

- Seek approval from Nasdaq that they may offer Managed Data Solutions
- Report Managed Data Solution Recipients using the Online Reporting System for Summary and detailed Usage Reporting
- Report Managed Data Solution Recipients using data in display and/or non-display Devices
- If Non-Display usage is approved fee-waived by Nasdaq for a Managed Data Solution Recipient, this usage should be reported using a non-billable reporting code
- Offer an integrated data solution with secured data transmissions and data usage monitoring capabilities
- Assume the liability for any unauthorized use of Nasdaq Information by Managed Data Solution Recipients

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## C. CP1. SUBSCRIBER: CONTROLLED DEVICE/ACCESS/USER

Data Product	Type Offered
All Nasdaq Information	Display

### OVERVIEW

A Controlled Device/Access is a type of Controlled Product that contains Nasdaq Information that is offered by a Distributor where the Distributor controls both the entitlements and the display of the Information. Nasdaq allows Distributors to report such Controlled Products to Nasdaq as Subscribers.

If an API provided with a Controlled Device does not restrict data similar to the Controlled Device, or allows for redistribution from the Subscriber, the Distribution of the API will be liable for the misuse of the Information as knowing providing a data feed.

## D. CP2. HOSTED DISPLAY SOLUTION

Data Product	Type Offered
Nordic Equity Last Sale, Level 1 or Level 2, Real-Time and Delayed	Display Only
Nordic Equity Derivatives Level 2, Delayed	
Nordic Fixed Income, Delayed	

### OVERVIEW

A Hosted Display Solution is a product, solution or capability provided by a Distributor in which the Distributor makes Nasdaq Information available to an application branded or co-branded with a third-party brand for use by external Subscribers of the third-party entity or Distributor. The Distributor maintains control of the data, entitlements and display of the product, solution or capability. The Hosted Display Solution may take a number of forms. Examples include, but not limited to:

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- “Widget,” such as an iframe or applet, in which the Hosted Display Solution is a part or a subset of a website or platform.
- “White Label,” in which the Distributor hosts or maintains the website or platform on behalf of a third party entity.

## E. UNIT OF COUNT: COUNTING GUIDELINES

### **SIMULTANEOUS ACCESS**

Simultaneous access by Unique User ID is prohibited, unless the Customer is able to record, track and report the number of users able to simultaneously access Nasdaq Information. (See pricing clarifications for additional details)

### **CONTENDED ACCESS**

Contended access refers to a service in which multiple Subscribers or Devices access information through a limited number of access sessions. The number of contended access sessions may be smaller than the number of Subscribers or Devices with access capability. Please note that Nasdaq does not consider a contended access session to be equivalent to a Subscriber or an Interrogation Device. In contended access situations, the Customer must base usage reporting on the number of Subscribers, Interrogation Devices, or Users capable of accessing the Information, not the number of potential simultaneous sessions.

## 10. HOW TO BECOME A DISTRIBUTOR

Nasdaq Form or Agreement		UP1		UP2	CP1	CP2	
Distributor Requirements	Nasdaq Global Data Agreement	X		X	X	X	
	Nasdaq Data Feed Request Form	X		X	X	X	
	Detailed Reporting	X		X	X	X	
Recipient Requirements	Nasdaq Global Data Agreement	X					
	Nasdaq Data Feed Request Form	X					
	Detailed Reporting	X					

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# 11. PROFESSIONALS AND NON-PROFESSIONALS

## GUIDANCE FOR IDENTIFYING PROFESSIONALS AND NON-PROFESSIONALS

Questions Regarding Professional/Non-Professional	Professional	Non-Professional
Are you accessing market data solely for your own personal investment decisions, and only using your own personal capital?	No	Yes
Are you managing other people's money, acting as an investment adviser, earning commissions, profit sharing, providing financial advice, or using the data for any other business purpose?	Yes	No

## GUIDANCE FOR NON-PROFESSIONAL SUBSCRIBER DATA COLLECTION

At the time of a Compliance Review, Nasdaq may request the External Recipient data for Non-Professionals to confirm that the External Recipients are correctly qualified to receive the Information at the Non-Professional rates. Misclassified Recipients may be billed at the Professional or Data Feed Recipients rates.

To ensure proper qualification and compliance, Distributors should collect, at a minimum, the following identifying information for each External Recipient:

- First Name
- Middle Initial or Name (if any)
- Last Name
- User Postal Code (if any)
- User Country
- Occupation
- Employer Name (if any)
- Employer Postal Code

This data must be maintained in a verifiable format and made available upon request to demonstrate adherence to the qualification standards.

Version 1.5.

# DOCUMENT UPDATES

## OVERVIEW

Document updates provide insight into changes of data policies. Major policy updates will be identified by a new release # (e.g. 2.0) Minor technical updates will be identified by version (e.g. X.1).

### January 1, 2021: Version 1.1

- Derived policy updated [Notice](#):  
<https://newsclient.omxgroup.com/cdsPublic/viewDisclosure.action?disclosureId=955106&lang=en>
- Clarification on Internal Distributor fee in relation to derived data added to the derived section
- Added Distributor Fee section
- Added new Administration Fee section to the document previously available in standalone document
- New Nordic Fixed Income product replaces Nordic Fixed Income Level 2 & TotalView and references to obsolete products have been removed
- Added exemptions to LBMA Trade Data- and Corporate Actions products are exempted from the requirement to report at least one Subscriber for a product as presented in Nasdaq Reporting Policy document
- Added policy on Managed Data Solution (MDS) Non-display

### April 1, 2021: Version 1.2

- Added ESG products to Administration Fee-table
- Added Salmon Index product
- Updated product name for Nordic & Baltic Equity Last Sale products

### July 2, 2021: Version 1.3

- Added Nasdaq Sustainable Bond Network products
- Added TM2 products
- Added Baltic CSD products
- Added Nasdaq ESG Data Hub products

### January 1, 2022: Version 1.4

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- Updated Delayed data policies
- Nordic Derivatives data product now referred to as Nordic Equity Derivatives
- Removed section on Administration Fees; obsolete as of January 1, 2022

#### January 24, 2022: Version 1.4.1

- Updated Definitions to follow ESMA Guidelines

#### March 11, 2022: Version 1.4.2

- Updated use of definitions. Nasdaq is standardizing certain terminology in accordance with MiFID II and MIFIR obligations and to align to Nasdaq European Data Policies. Definitions moved to first section of document.
- Removed Distributor fee clarification table
- Removed references to obsolete Administration Fees

#### January 20, 2023: Version 1.4.3

- Corrected dates in Document Updates section
- Clarification on Internal Distributor License in relation to Non-Professional External Distributor fee added
- Updated Non-Display product names in Non-display section in relation to MDS pricing note to match names in Price List
- Removed TM2 products
- Added information on new product: Danish Fixed Income Announcement file
- Added information on product: Nordic Bond Analytics
- Updates related to new Equity Derivatives Trading system: EqD for Equity Derivatives products
- New Natural Users policy replacing Nasdaq Netting Program; including updates to the Unit of Count section in this document.
- Removal of references to Subscriber Agreement. More details in notice: Data News #2022 – 3 - Nasdaq Updates the Nasdaq Global Data Agreement. <http://www.nasdaqtrader.com/TraderNews.aspx?id=dn2022-3>

#### January 1, 2024: Version 1.4.4

- In the definitions section, re-named “Data Feed Subscriber” as “Data Feed Recipient” to ensure consistency with the definitions in the GDA.

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- In the Derived Data Pricing Clarifications section, added information on derived usage under the Nordic Fixings Enterprise License.
- Updated the Natural Users policy to reflect introduction of the specific Natural User fees in the Price List and clarified the reporting of systems in the European Natural Users Reporting File. Changes were also reflected in the Unit of Count section.

#### **June 12, 2024: Version 1.4.5**

- Spotlight Exchange data note added to Nordic Equity product Pricing Clarifications.
- Updated references to new usage reporting system: Data-Client Portal

#### **January 1, 2025: Version 1.5**

- Introduction of Non-Display Trading Platform categories.
- Added clarification on Data Feed unit of count that an API is defined as data feed. (CP1, 8. UNIT OF COUNT TERMINOLOGY: Data Feed)
- Added policies for new APA products and updated details on APA/OTC data available via Bundled Products.
- Removed policy on text-television.
- Removed references to Salmon index products.
- Added policies for Carbon Removal Data – CORC data products.

#### **January 1, 2025: Version 1.5.1**

- Added Designated Publishing Entity (DPE) and updated category clarifications to Non-Display Trading Platform Categories.

#### **March 6, 2025: Version 1.5.2**

- Removed references to NSBN products. NSBN policies are now available in separate document.

#### **January 1, 2026: Version 1.5.3**

- Added clarification on derived data for product: Trading Platform Category 1: Systematic Internalization System(s) license.
- Updated link to news web page
- Added Fixed Income to specifications around reference data for ITCH connections.

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#### **April 1, 2026: Version 1.5.4**

- Removed reference to commodities products.
- Added section on professionals and non-professionals
- Revision of definitions to reflect the latest version of the Nasdaq Global Data Agreement (GDA).

#### **September 1, 2026: Version 2.0**

- Added new definitions from the Commission Delegated Regulation (EU) No 2025/1156
- Added policy around cancellation for products with annual billing setup
- Added reference to other Market Data Policy Documents
- Removed ESG Portal references
- Removing Nordic Fixing from the fixed income entitlement
- Changes to Spotlight data that it is no longer included with Nordic Equity products.
- Changes related to new Customer categories in Price List