**Illustrative Questionnaire for the Due
 Diligence of Outsource Service Providers**

|  |
| --- |
| NAME OF SERVICE PROVIDER RESPONDING: |
| Click here to enter text. |
|  |
| AS OF DATE OF THIS DDQ:  |
| Click here to enter a date. |
|  |
| CONTACT DETAILS FOR PERSON AT SERVICE PROVIDER TO DISCUSS DDQ WITH: |
| Click here to enter text. |
|  |  |
| [ ]  | Tick here if the responding company undertakes to notify the recipient of material changes that take place to answers provided in this DDQ |
|  |  |
| NAME OF REQUESTING AIMA MEMBER: |
| Click here to enter text. |

Certification

Service providers filling in this DDQ must make one of the certifications below.

*When the DDQ is provided in other than electronic platform format, the certification must appear in a location that is between the front cover page and the table of contents regardless of format.*

|  |
| --- |
| Tick the one that applies. If none do, your company is not authorised to distribute this DDQ under AIMA’s copyright. |
|[ ]  Our company is a member of AIMA and *we have not changed any of the AIMA questions or set responses*. We have abided by the Terms of Use. |
|[ ]  Our company is a member of AIMA and *we have changed some of the AIMA questions or set responses and have accordingly removed the AIMA branding as required*. We have abided by the Terms of Use. |
|[ ]  Our company is not itself a member of AIMA but this DDQ was provided to our company to fill in by a member of AIMA. We understand that because our company is not a member of AIMA, our company is not authorised under AIMA’s copyright to supply a completed copy of this DDQ to anyone other than the providing AIMA member. *We have not changed any of the AIMA questions or set responses*. We have abided by the Terms of Use. |
|[ ]  Our company is not itself a member of AIMA but this DDQ was provided to our company to fill in by a member of AIMA. We understand that because our company is not a member of AIMA, our company is not authorised under AIMA’s copyright to supply a completed copy of this DDQ to anyone other than the providing AIMA member. *We have changed some of the AIMA questions or set responses and have accordingly removed the AIMA branding as required*. We have abided by the Terms of Use. |

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 **Illustrative Questionnaire for the Due
 Diligence of Outsource Service Providers**

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| 1. Basic Company Information |
| --- |
| 1.1 [ ] N/A [ ] More | What is the name of the service provider completing this DDQ (referred to in the DDQ as the ‘company’)? | Click here to enter text. |
| 1.2 [ ] N/A [ ] More | Is the legal name of the company different from the name of the company completing this DDQ? | [ ]  Yes, and the company’s legal name is provided below.[ ]  NoClick here to enter text. |
| 1.3 [ ] N/A [ ] More | What is the company’s principal business address? | Click here to enter text.  |
| 1.4 [ ] N/A [ ] More | Is the registered address of the company different from its principal business address? | [ ]  Yes, and the company’s registered address is provided below.[ ]  NoClick here to enter text. |
| 1.5 [ ] N/A [ ] More | What is the company’s registration number? | Click here to enter text.[ ]  Not applicable |
| 1.6 [ ] N/A [ ] More | What is the company’s website address? | Click here to enter text. |

| 2. Product/Service Information |
| --- |
| *To the reader*: In the first column, if the “N/A” box is selected, the company believes the question is not applicable to the company’s operations and the company has deliberately left all of the answer choices for that question blank. If the “More” box is selected, this is a signal to the reader that the company has provided additional information relating to that particular question/response/topic in the rows provided for that purposes starting at page 5 of this document. |
| 2.1 Relevant Product/Service |
| 2.1.1 [ ] N/A [ ] More | By what name does the company refer to the product and/or service to which the responses in the rest of the DDQ relate (the ‘relevant product and/or service’)? | Click here to enter text. |
| 2.1.2 [ ] N/A [ ] More | Please describe the nature of the relevant product and/or service. | Click here to enter text. |
| 2.1.3 [ ] N/A [ ] More | In what year did the company begin offering the relevant product and/or service? | Click here to enter text. |
| 2.1.4 [ ] N/A [ ] More | Describe the company’s business model and its business lines. | Click here to enter text. |
| 2.1.5 [ ] N/A [ ] More | How does the relevant product/service fit into the range of products/services offered by the company? | Click here to enter text. |
| 2.2 Reporting and Monitoring |
| 2.2.1 [ ] N/A [ ] More | List any types of reporting to clients or other correspondence provided with respect to the relevant product and/or service, indicating the frequency of each report/correspondence, the types of information provided, the timeliness of the information and how the information is provided. | [ ]  This information is provided below.[ ]  Available on request: Click here to enter text.[ ]  The company does not provide regular transparency or reporting to clients.Click here to enter text. |
| 2.2.2 [ ] N/A [ ] More | Can clients receive customised reports with respect to the relevant product and/or service? | [ ]  Yes[ ]  Yes, subject to the conditions discussed below.[ ]  NoClick here to enter text. |
| 2.2.3 [ ] N/A [ ] More | What are the typical key performance indicators (‘KPIs’) that the company works to with respect to the relevant product and/or service? | [ ]  Information on typical KPIs with respect to the relevant product and/or service are discussed below [ ]  There are no relevant KPIs with respect to the relevant product and/or service.[ ]  Not availableClick here to enter text. |
| 2.3 Experience and Capability to Provide the Relevant Product/Service |
| 2.3.1 [ ] N/A [ ] More | To how many active clients does the company provide the relevant product and/or service? | Click here to enter text. |
| 2.3.2 [ ] N/A [ ] More | How many of the company’s active clients are in the business of hedge funds or alternative investment funds? | Click here to enter text. |
| 2.3.3 [ ] N/A [ ] More | Please supply the company’s current staff organisational chart. | [ ]  Attached/included: Click here to enter text.[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  Available online: Click here to enter text.[ ]  Not available for review[ ]  We do not have one |
| 2.3.4 [ ] N/A [ ] More | Please provide the number of employees providing the relevant product and/or service by location and department. **Instruction:** If an employee does not devote his/her entire time to the relevant product and/or service, include only their full-time equivalent amount (in tenths of an FTE) for the relevant product and/or service. | [ ]  Provided as part of the staff organisational chart[ ]  Provided belowClick here to enter text. |
| 2.3.5 [ ] N/A [ ] More | Please list any C-suite, executive management or department head new hires, appointments or leavers in the last 24 months. | Click here to enter text. |
| 2.3.6 [ ] N/A [ ] More | Provide the following details for the primary and each relevant secondary relationship manager for the relevant product and/or service:• name and title;• telephone number; and• e-mail address.If there is no relationship manager for the relevant product and/or service, please respond “None”. | Click here to enter text. |
| 2.3.7 [ ] N/A [ ] More | What percentage of the company’s revenue for the most recently completed quarter is represented by the company’s three, five and 10 largest clients?***Instruction***: For purposes of this question, please aggregate all clients with the same decision maker together to count as a single client. | Top three | XX.XX% |
| Top five | XX.XX% |
| Top 10 | XX.XX% |
| 2.4 Verification from External Sources |
| 2.4.1 [ ] N/A [ ] More | Provide at least two references from significant clients using the relevant product and/or service including the referees’: • name and title;• organisation;• telephone number;• e-mail address;•relationship with the company and its key staff;•how long they have been a client. | [ ]  Set out below[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  Not availableClick here to enter text. |
| 2.4.2 [ ] N/A [ ] More | For companies with less than 50 employees, provide two independent references for each of the founders or principals, including the referees’: • name and title;• organisation;• telephone number;• e-mail address;• relationship with the company and its key staff. | [ ]  Set out below[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  The company has more than 50 employees[ ]  Not availableClick here to enter text. |
| 2.5 Additional Questions about the Relevant Product/Service |
| Further Question | Add a question below:Click here to enter text. | Click here to enter text. |
| 2.6 Company Comments on the Product/Service Information Questions |
| Comment | Enter relevant question number:Click here to enter text. | Click here to enter text. |

| 3. Further Company Information |
| --- |
| *To the reader*: In the first column, if the “N/A” box is selected, the company believes the question is not applicable to the company’s operations and the company has deliberately left all of the answer choices for that question blank. If the “More” box is selected, this is a signal to the reader that the company has provided additional information relating to that particular question/response/topic in the rows provided for that purposes starting at page 10 of this document. |
| 3.1 Structure |
| 3.1.1 [ ] N/A [ ] More | Company organisation chart (corporate structure), including parent entities and all affiliates providing services to the company’s clients as well as any individuals that directly or indirectly own or control 25% of the outstanding equity of the company (or its parent entity). | [ ]  Attached/included: Click here to enter text.[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  Available online: Click here to enter text.[ ]  Not available for review[ ]  We do not have one |
| 3.1.2 [ ] N/A [ ] More | Have there been any material and adverse company ownership or structure changes over the past three years, including, but not limited to, acquisitions, joint ventures, mergers, personnel lift-outs, etc.? | [ ]  Yes, and this is discussed further below.[ ]  NoClick here to enter text. |
| 3.1.3 [ ] N/A [ ] More | Are there any publicly announced (including in news/media reports) future plans for any company ownership or structure changes, including, but not limited to, acquisitions, joint ventures, mergers, personnel lift-outs, etc.? | [ ]  Yes, and this is discussed further below.[ ]  NoClick here to enter text. |
| 3.2 Regulatory Matters |
| 3.2.1 [ ] N/A [ ] More | (a) Does the company require any authorisation and/or registration with a regulatory authority in order to provide the relevant product and/or service? | [ ]  Yes, and the names(s) of the relevant regulator(s) together with a description of each type of authorisation and/or registration obtained from each such regulator and the corresponding authorisation and/or registration number(s) is provided below.[ ]  No, and, as a consequence, (b)-(d) below have been left blank. [ ]  No, and, as a consequence, the rows for Questions 3.2.1(b)-(d) in the template DDQ have been omitted.Click here to enter text. |
| [ ] N/A [ ] More | (b) In what year was the company’s last review/thematic review by its primary regulator? | Click here to enter text. |
| [ ] N/A [ ] More | (c) Is the company’s last review/thematic review open or closed? *(Select one)* | [ ]  Still open[ ]  Closed |
| [ ] N/A [ ] More | (d) Will the company disclose the content/details of the findings of its last regulatory inspection from its primary regulator upon request? | [ ]  Yes, where allowed by law or regulation.[ ]  No |
| 3.2.2 [ ] N/A [ ] More | Has the company or any member of its senior management ever been convicted of or plead guilty or no contest to an offence or otherwise been conclusively found by any court, regulatory authority or any official body to have engaged in any wrongdoing involving (i) fraud, false or materially misleading statements or omissions, dishonesty, bad faith, wilful default; (ii) investments or an investment-related or other financial business; (iii) theft; (iv) bribery, forgery, counterfeiting, extortion or gambling; (v) tax evasion; or (vi) any other felony or misdemeanour (excluding driving offences)?Please include historical or pending items as part of the response. | [ ]  Yes, and further information is provided below.[ ]  Available on request: Click here to enter text.[ ]  NoClick here to enter text. |
| 3.2.3 [ ] N/A [ ] More | Has any application for registration, authorisation or a license of any kind to a regulatory body on behalf of the company or an individual staff member ever been refused, suspended or withdrawn/revoked within the last five years?  | [ ]  Yes, and further information is provided below.[ ]  Available on request: Click here to enter text.[ ]  NoClick here to enter text. |
| 3.2.4 [ ] N/A [ ] More | Does the company have a “living will”? *(Select all that apply)* | [ ]  Attached/included: Click here to enter text.[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  Available online: Click here to enter text.[ ]  Not available for review[ ]  We do not have one[ ]  We are not required by law to have one |
| 3.3 Financial Matters |
| 3.3.1 [ ] N/A [ ] More | During the last five years (or the life of the company, if shorter), have all required tax returns been filed and taxes paid on time? | [ ]  Yes[ ]  No, and details are provided below.Click here to enter text. |
| 3.3.2 [ ] N/A [ ] More | What firm currently is appointed as auditor of the company’s financial statements? | Click here to enter text. |
| 3.3.3 [ ] N/A [ ] More | Have the company’s financial statements been qualified by its external auditor in the last 24 months? | [ ]  Yes[ ]  No |
| 3.3.4 [ ] N/A [ ] More | Has the company or any affiliated entity ever failed to make payments under any secured or unsecured indebtedness? | [ ]  Yes, and a description of each such situation is set out below.[ ]  NoClick here to enter text. |
| 3.3.5 [ ] N/A [ ] More | Has the company, an entity affiliated with the company or any current or former principal of the company ever filed for bankruptcy? | [ ]  Yes, and a description of each such situation is set out below.[ ]  NoClick here to enter text. |
| 3.4 Employees |
| 3.4.1 [ ] N/A [ ] More | Which types of internal (i.e., performed by company personnel) and external (i.e., performed by a third-party vendor) background checks does the company conduct for each category of person/entity before they are hired and are granted access to sensitive data and how frequently are such checks made/renewed?**Instructions:** For each type of check listed in the table below, indicate which types of persons are subject to that check and with what frequency (selecting as many of the frequency choices as apply in each case).For companies employing more than 250 people, the response to this question may be limited to the C-suite and employees, consultants, external providers and others related to the relevant product and/or service. | [ ]  See table below [ ]  The company has more than 250 employees and we have chosen to limit our response to this question in accordance with the instructions. See table below.[ ]  None, and, as a consequence, the table below has been left blank.[ ]  None, and, as a consequence, the rows containing the table following Question 3.4.1 in the template DDQ have been omitted. |
| Type of background check | Type of person/entity |
| Permanent Employees | Temporary Employees | Consultants | External Providers | Others |
| Credit (internal) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Credit (external) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Criminal (internal) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Criminal (external) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Drug (internal) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Drug (external) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Employment (internal) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Employment (external) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Other (internal) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| Other (external) | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable | [ ]  Pre-hiring[ ]  On hiring[ ]  Annually[ ]  Ad hoc[ ]  Not applicable |
| 3.4.2 [ ] N/A [ ] More | Are any senior management or department heads members of the same family or the same household?  | [ ]  Yes, and further information is provided below.[ ]  NoClick here to enter text. |
| 3.5 Complaints and Litigation |
| 3.5.1 [ ] N/A [ ] More | Have there been any prior lawsuits (in the last five years) to which the company was a party that involved allegations of privacy breaches, data breaches, violations of laws governing securities or commodities, fraud, gross negligence or wilful default? | [ ]  Yes, and details are provided below.[ ]  NoClick here to enter text. |
| 3.5.2 [ ] N/A [ ] More | Are there any current or pending lawsuits (including any complaints received that may eventually develop into litigation) to which the company is a party that involve allegations of privacy breaches, data breaches, violations of laws governing securities or commodities, fraud, gross negligence or wilful default?  | [ ]  Yes, and details are provided below.[ ]  NoClick here to enter text. |
| 3.5.3 [ ] N/A [ ] More | Are there any current or pending lawsuits that may reasonably affect the company’s ability to provide the relevant product and/or service if decided against the company?  | [ ]  Yes, and details are provided below.[ ]  NoClick here to enter text. |
| 3.6 Independent Assurance |
| 3.6.1 [ ] N/A [ ] More | Provide any SSAE 18/ISAE 3402/SOC 1 report or similar type internal controls report as well as any ISO 22301, ISO 27001 certifications or any other cybersecurity or information security certifications relevant to (i) the company as a whole and (ii) the relevant product/service. | [ ]  Attached/included: Click here to enter text.[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  Available online: Click here to enter text.[ ]  Not available for review[ ]  We do not have one |
| 3.6.2 [ ] N/A [ ] More | Do the external audit reports/certifications provided in response to Question 3.6.1 cover all locations and functions applicable to the relevant product/service? Please detail any material exclusions/omissions. If the company does not have one, please select “No” and in the text box explain why the company does not have one. | [ ]  Yes[ ]  No, and further information is provided below.Click here to enter text. |
| 3.7 Insurance |
| 3.7.1 [ ] N/A [ ] More | (a) What types of insurance does the company have? *(Select all that apply)* | [ ]  Professional indemnity[ ]  Errors and omissions[ ]  Social engineering[ ]  Cyber[ ]  Building/contents (including IT hardware and office fixtures)[ ]  Other *(please specify)*: Click here to enter text.[ ]  None of the above |
| [ ] N/A [ ] More | (b) Has the company made an insurance claim on any of the above policies in the last 24 months? | [ ]  Yes[ ]  No |
| 3.8 Additional Questions about the Company |
| Further Question | Add a question below:Click here to enter text. | Click here to enter text. |
| 3.9 Company Comments on the Further Company Information Questions |
| Comment | Enter relevant question number:Click here to enter text. | Click here to enter text. |

| 4. Policies, Procedures, Standards and Controls |
| --- |
| *To the reader*: In the first column, if the “N/A” box is selected, the company believes the question is not applicable to the company’s operations and the company has deliberately left all of the answer choices for that question blank. If the “More” box is selected, this is a signal to the reader that the company has provided additional information relating to that particular question/response/topic in the rows provided for that purposes starting at page 15 of this document. |
| 4.1 Compliance, Culture and Ethics |
| 4.1.1 [ ] N/A [ ] More | Is the company’s compliance and operations manual available for review? *(Select all that apply)* | [ ]  Yes, a copy of the manual is available on request: Click here to enter text.[ ]  Yes, a copy of the manual is available to review onsite. [ ]  Yes, a copy of the manual is available online: Click here to enter text.[ ]  Yes, a summary of the manual is available on request: Click here to enter text.[ ]  Yes, a summary of the manual is available to review onsite. [ ]  Yes, a summary of the manual is available online: Click here to enter text.[ ]  No, although the company has such a manual, neither the manual nor a summary is available for review.[ ]  The company has not adopted a compliance and operations manual. |
| 4.1.2 [ ] N/A [ ] More | Which of the following are features of the company’s compliance culture? *(Select all that apply)* | [ ]  The company has implemented such policies and procedures as are necessary for the company to ensure compliance will all laws and regulations applicable to it and the products/services it offers.[ ]  An internal test of each of the company’s policies, procedures and controls is conducted at least annually.[ ]  An internal review of the compliance policies and procedures is conducted at least annually and the results of such reviews are reported to the company’s governing body/management committee.[ ]  An external review of the compliance policies and procedures is conducted at least annually.[ ]  The company has appointed a chief compliance officer or other dedicated head of compliance.[ ]  The company’s chief compliance officer or other dedicated head of compliance has a direct reporting line to the company’s management committee/governing body.[ ]  The company provides or makes available compliance training for is staff.[ ]  The same policies, procedures and controls apply to all employees, consultants (if any) and contractors (if any).[ ]  The company has adopted policies and procedures to protect corporate whistle-blowers. |
| 4.1.3 [ ] N/A [ ] More | Does the company make any exceptions to the security policy/processes for person or group of persons? *(Select all that apply)* | [ ]  C-suite executives[ ]  Senior staff[ ]  Staff working remotely[ ]  Temporary employees[ ]  Consultants[ ]  Other *(please specify)*: Click here to enter text.[ ]  No exceptions |
| 4.1.4 [ ] N/A [ ] More | Are employees, sub-contractors and temporary workers with access to client data bound to confidentiality (whether separately or as part of their employment contract and/or code of conduct)?  | [ ]  Yes[ ]  No |
| 4.1.5 [ ] N/A [ ] More | Are employees, sub-contractors and temporary workers with access to client data, bound by the company’s Information Security Procedures?  | [ ]  Yes[ ]  No |
| 4.1.6 [ ] N/A [ ] More | Which of the following are features of the company’s risk management culture? *(Select all that apply)* | [ ]  The company has a dedicated internal audit function within the company or at group level.[ ]  The company’s operational risk management framework is reviewed and updated on an ongoing basis.[ ]  An internal review of the company’s risk management framework is conducted at least annually and the results of such reviews are reported to the company’s governing body/management committee.[ ]  The company has a written conflicts of interest policy that is reviewed at least annually.[ ]  The company maintains a conflicts of interest register.[ ]  The company has appointed a chief risk officer or other dedicated head of risk management.[ ]  The company’s chief risk officer or other dedicated head of risk management has a direct reporting line to the company’s management committee/governing body. |
| 4.1.7 [ ] N/A [ ] More | Does the company have a policy on corporate social responsibility and identifying, managing and mitigating environmental, social and governance risks it faces or which its activities may be creating? *(Select all that apply)* | [ ]  Yes, a copy of this policy is available on request: Click here to enter text.[ ]  Yes, a copy of this policy is available to review onsite.[ ]  Yes, a copy of this policy is available online: Click here to enter text.[ ]  Yes, a summary of this policy is available on request: Click here to enter text.[ ]  Yes, a summary of this policy is available to review onsite. [ ]  Yes, a summary policy is available online: Click here to enter text.[ ]  No, although the company has such a policy, neither the policy nor a summary is available for review.[ ]  The company has not adopted such a policy. |
| 4.2 Data Protection/Personally Identifiable Information/Personal Data |
| 4.2.1 [ ] N/A [ ] More | Please provide a brief summary of, and any: * terms of service;
* privacy notices; and
* compliance policies and procedures

that relate to the company’s collection of data, and handling of the data and communication and dissemination of the data. | Click here to enter text. |
| 4.2.2 [ ] N/A [ ] More | Does the company collect any personally identifiable information (‘PII’) or other personal data as part of its products and/or services? | [ ]  Yes, and the jurisdictions in which the company collects personally identifiable information or personal data are listed below.[ ]  NoClick here to enter text. |
| 4.2.3 [ ] N/A [ ] More | How does the company identify whether it collects any PII and/or personal data? | Click here to enter text. |
| 4.2.4 [ ] N/A [ ] More | What information is provided to natural persons regarding the commercialisation of their data (either by the company or by a third-party data provider)? | Click here to enter text. |
| 4.2.5 [ ] N/A [ ] More | Who is responsible for the company’s Data Privacy Policy? | [ ]  The responsible person is identified below.[ ]  Not applicableClick here to enter text. |
| 4.2.6 [ ] N/A [ ] More | Does the company employ any de-identification or anonymisation protocols? | [ ]  Yes, and those de-identification or anonymisation protocols are described below.[ ]  NoClick here to enter text. |
| 4.2.7 [ ] N/A [ ] More | Is any PII stored on end user workstations or laptops?  | [ ]  Yes[ ]  No |
| 4.2.8 [ ] N/A [ ] More | Is PII data encrypted? | [ ]  Yes[ ]  No |
| 4.3 Technology Risk Management |
| 4.3.1 [ ] N/A [ ] More | Does the company have a separate IT department or is it primarily outsourced? *(Select one)* | [ ]  IT is performed entirely in house[ ]  IT is entirely outsourced[ ]  IT is partially outsourced as described below.Click here to enter text. |
| 4.3.2 [ ] N/A [ ] More | (a) Has the company developed a formal, documented Cyber Incident Response Plan (CIRP) that describes workflow in the event of a cyber incident and which is designed to effectively identify, detect, respond and recover from a cybersecurity incident such as a breach or data loss? | [ ]  Yes[ ]  No, and, as a consequence, (b) below has been left blank.[ ]  No, and, as a consequence, the row for Question 4.3.6(b) in the template DDQ has been omitted. |
| [ ] N/A [ ] More | (b) Have the CIRP and corresponding procedures been tested? | [ ]  Yes, and the date of the last test is provided below.[ ]  NoClick here to enter text. |
| 4.3.3 [ ] N/A [ ] More | Has the company experienced any material internal, external information/cyber security incident in the past three years? | [ ]  Yes[ ]  No |
| 4.3.4 [ ] N/A [ ] More | Does the company use proprietary or non-proprietary systems to deliver its services? | [ ]  Entirely proprietary systems[ ]  Entirely non-proprietary systems[ ]  A combination of proprietary and non-proprietary systems and further information is provided below.Click here to enter text. |
| 4.4 Business Continuity and Disaster Recovery |
| 4.4.1 [ ] N/A [ ] More | Which of the following are features of the company’s Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP)? *(Select all that apply)* | [ ]  They are in writing[ ]  They are regularly reviewed for appropriateness[ ]  They have been approved by senior management[ ]  Employees receive regular training on their implementation[ ]  They are tested at least annually[ ]  All business critical staff have the ability to work from home[ ]  Recovery time objectives have been set[ ]  Recovery point objectives have been set[ ]  Primary and secondary data centres on different utility and power grids[ ]  Primary and secondary data centres use different utility/power providers[ ]  The company uses a physical offsite backup[ ]  All servers and network devices receive power from an Uninterruptable Power Supply (UPS)[ ]  The company’s premises have their own backup generator which supports all services[ ]  The company uses an automated system to inform staff of incidents [ ]  The company uses a call tree to inform staff of incidents[ ]  The company has a specific back location for staff *(please specify the functions accommodated there)*: Click here to enter text.[ ]  Other *(please specify)*: Click here to enter text.[ ]  We do not have a BCP[ ]  We do not have a DRP |
| 4.4.2 [ ] N/A [ ] More | When working from home, do staff use company-supplied hardware or their own? *(Select one)* | [ ]  Company-supplied only[ ]  Personal only[ ]  Combination of company-supplied and personal |
| 4.4.3 [ ] N/A [ ] More | What is estimated recovery time to be able to operate critical business systems in order not to materially affect SLAs? *(Select one)* | [ ]  Within 2 hours[ ]  Within 5 hours[ ]  Within 10 hours[ ]  Within 24 hours [ ]  Other *(please specify)*: Click here to enter text. |
| 4.5 Additional Questions about Policies, Procedures, Standards and Controls |
| Further Question | Add a question below:Click here to enter text. | Click here to enter text. |
| 4.6 Company Comments on the Policies, Procedures, Standards and Controls Questions |
| Comment | Enter relevant question number:Click here to enter text. | Click here to enter text. |

| 5. Third Parties/Outsourcing |
| --- |
| *To the reader*: In the first column, if the “N/A” box is selected, the company believes the question is not applicable to the company’s operations and the company has deliberately left all of the answer choices for that question blank. If the “More” box is selected, this is a signal to the reader that the company has provided additional information relating to that particular question/response/topic in the rows provided for that purposes starting at page 17 of this document. |
| 5.1 Outsourcing |
| 5.1.1 [ ] N/A [ ] More | (a) Does the company make use of any sub-contractors or service providers (including any onshore or offshore affiliates of the company) in providing the relevant product and/or service? | [ ]  Yes, and the main sub-contractors the company uses in relation to the relevant product and/or service are identified below.[ ]  No, and, as a consequence, (b)-(c) below have been left blank.[ ]  No, and, as a consequence, the rows for Questions 5.1.1(b)-(c) in the template DDQ have been omitted.Click here to enter text. |
| [ ] N/A [ ] More | (b) Are any of the sub-contractor/service provider product(s) and/or service(s) used hosted in the cloud?  | [ ]  Yes, and details are provided below.[ ]  NoClick here to enter text. |
| [ ] N/A [ ] More | (c) Do the company’s sub-contractors/service providers store or process client confidential information? | [ ]  Yes[ ]  No |
| [ ] N/A [ ] More | (d) Are sub-contractors/service providers held to the same level of policy and cybersecurity as company? | [ ]  Yes[ ]  No |
| 5.1.2 [ ] N/A [ ] More | Does the company perform due diligence on their current and potential sub-contractors and service providers? | [ ]  Yes, and the due diligence process performed is described below.[ ]  NoClick here to enter text. |
| 5.1.3 [ ] N/A [ ] More | With respect to each of the **company’s** service providers (including, but not limited to, any affiliates and any providers of outsourced or delegated functions), provide following:• name, address, LEI or register number (if any) and parent company (if any) of the provider;• the service or outsourced function provided and the location(s) from which each such service or function will be provided;• a brief description of the services provided;• the appointment year;• if a material outsource arrangement, the rationale for the outsourcing; and •whether the service involves the third party having access to client data and, if so, where such data will be stored. | [ ]  Attached/included: Click here to enter text.[ ]  Available for review onsite[ ]  Available on request: Click here to enter text.[ ]  We do not have any service providers or outsource/delegate any functions to other entities. |
| 5.1.4 [ ] N/A [ ] More | (a) How frequently does the company perform periodic reviews of quality of service, cost and additional value provided by its service providers listed in response to Question 5.1.3? | [ ]  More frequently than quarterly[ ]  Quarterly[ ]  Semi-annually[ ]  Annually[ ]  Less frequently than annually [ ]  Never, and, as a consequence, (b)–(d) below have been left blank.[ ]  Never, and, as a consequence, the rows for Questions 5.1.4(b)-(d) in the template DDQ have been omitted. |
| [ ] N/A [ ] More | (b) Are the company’s reviews of service providers documented? | [ ]  Yes[ ]  No |
| [ ] N/A [ ] More | (c) Does the company perform onsite reviews on all of its service providers? | [ ]  Yes[ ]  Yes, but not all of them and the types included or excluded from such reviews are identified below.[ ]  No, and, as a consequence, (d) below has been left blank.[ ]  No, and, as a consequence, the row for Question 5.1.4(d) in the template DDQ has been omitted.Click here to enter text. |
| [ ] N/A [ ] More | (d) How often does the company perform those onsite reviews? | [ ]  More frequently than quarterly[ ]  Quarterly[ ]  Semi-annually[ ]  Annually[ ]  Less frequently than annually |
| 5.1.5 [ ] N/A [ ] More | Have any company service providers, including, but not limited to the company’s auditors, been terminated or resigned within the last three years? | [ ]  Yes, and details are provided below.[ ]  NoClick here to enter text. |
| 5.1.6 [ ] N/A [ ] More | Where outsourced providers and delegates are able to sub-outsource/sub-delegate, how does the company safeguard that the subordinated provider also complies with obligations applicable to the company towards clients and that any required examination and inspection rights are safeguarded? | Click here to enter text. |
| 5.2 Service Levels |
| 5.2.1 [ ] N/A [ ] More | Has the company established written Service Level Agreements (‘SLAs’) with its own service providers? | [ ]  Yes[ ]  No |
| 5.2.2 [ ] N/A [ ] More | Has the company purchased maintenance contracts with equipment vendors to provide replacement parts in the event of system failure? | [ ]  Yes[ ]  No |
| 5.2.3 [ ] N/A [ ] More | For critical systems, has the company established a policy or purchased redundant components/services to expedite recovery in the event of a failure? | [ ]  Yes, and details are provided below.[ ]  NoClick here to enter text. |
| 5.2.4 [ ] N/A [ ] More | Please detail the specific security-related contractual provisions the company aims to include in agreements with technology vendors or vendors processing sensitive data. | Click here to enter text. |
| 5.3 Additional Questions about Third Parties/Outsourcing |
| Further Question | Add a question below:Click here to enter text. | Click here to enter text. |
| 5.4 Company Comments on the Third Parties/Outsourcing Questions |
| Comment | Enter relevant question number:Click here to enter text. | Click here to enter text. |

Explanations, Assumptions and Disclaimers

The space below has been provided for outsource providers to provide investment managers with any general explanations, assumptions and disclaimers that are relevant to the responses in this DDQ. If there are explanations or assumptions specific to individual questions, these should be included in the space provided for this purpose at the end of the applicable module with the relevant question(s) identified.

|  |
| --- |
| Click here to enter text. |

**This questionnaire was completed by (name):**

**The information in this questionnaire is accurate as of (date):**

By signing this questionnaire, you attest that the answers are complete and correct to the best of your knowledge and accurately reflect your company’s actual practices, policies, procedures and controls as of the date indicated above.

Date:

Signature:

Name:

Title:

Email:

Phone:

 **Illustrative Questionnaire for the Due
 Diligence of Outsource Service Providers**

# FURTHER INSTRUCTIONS

Note on Use by Investment Managers

This initial due diligence questionnaire is a tool to assist investment managers when they considering whether or not to engage a service provider to provide an outsourced service for the investment manager. While there are many common areas of diligence enquiry that will apply regardless of the type of outsource service to be provided and the materiality of the outsource service to the investment manager’s operations, investment managers should understand that this due diligence questionnaire may not include questions to cover all of the issues that will be relevant to a particular outsource arrangement. As a result, investment managers should take care to consider whether additional questions may be advisable in the circumstances. In addition, not all of the questions are applicable to all managers or all outsource service arrangements, but we recommend that you ask sufficient questions and request associated supporting material so that you are able to make an informed decision.

Investment managers can look at other AIMA DDQs to see if there are questions asked in other contexts that may be useful to ask initially or as a matter of follow up once the OSP has completed this initial questionnaire.

***For outsourcing to technology vendors or to vendors with a strong technology component to the relevant product or service, investment managers should consider using the AITEC-AIMA Illustrative Questionnaire for the Due Diligence of Vendor Technology and Cyber Security (the ‘AITEC-AIMA DDQ’) in lieu of this DDQ and including the optional section 13 in the long form AITEC-AIMA DDQ to cover the outsourcing questions.***

Investment managers should review with their legal counsel and other advisors the value of the responses and to what extent, if any, they may rely upon such responses. The contractual terms of an outsource service arrangement will normally be confined to the terms of the ultimate outsource service agreement and any operational level agreements (OLAs) and service level agreements (SLAs). In order to obtain the best possible information on any specific outsource provider, additional questions should be raised to clarify any point of uncertainty and, where practicable, verbal examination should be undertaken. In particular, AIMA recommends that, in respect of special areas of concern, independent third-party data should, if possible, be obtained in order to verify these facts.

Documents Requests; Attachments

Various questions in this DDQ request documents to be provided and often multiple options are given for how that information can be delivered. Some of these options require users to include certain additional information to help readers understand where/how they can access those materials:

* **Attached/included –** In the content control box following this option, the user should include the file name of the included or attached document where applicable and describe where and how the documents have been attached or included;
* **On request –** In the content control box following this option, the user should indicate where such requests should be sent and by what method; and
* **Online –** In the content control box following this option, the user should include the web address where the indicated material can be accessed.

Making Changes to the DDQ Template

While AIMA has used all reasonable efforts to produce a questionnaire of general application in connection with a due diligence appraisal of outsource providers, prior to any individual investment manager sending out the questionnaire, it is strongly recommended that the questions are reviewed and, where necessary, supplemented to suit its own requirements and its state of knowledge of the outsource provider’s operations.

It is strongly recommended that users neither alter nor delete AIMA’s questions. The value of this questionnaire for investment managers and outsource providers alike lies in the standardisation of the questions to allow investment managers to easily compare outsource providers and to reduce the outsource provider’s workload of responding to different forms of questionnaire.

That said, if there are additional questions to be asked, there is a section at the end of each module set aside for this purpose and additions should not be made anywhere else. That space can also be used by an outsource provider to provide any clarifications or additional information not otherwise called for by the standard question set.

To signal to readers that there is something relevant to read in the additional questions section, users should tick the **“More”** option in the first column.

If a question is not applicable to the user’s business model, instead of leaving it completely blank or removing the row, consider simply ticking the **“N/A”** option in the first column to signal to readers that the question is not applicable. Although this option has been provided for each row, users should consider selecting the “Not applicable” option among the answer choices where such a choice is available rather than selecting the “N/A” option. Readers may follow up to ask further questions about why a company believes an individual question is not applicable.

**In the event of any questions being altered or omitted from this questionnaire, users are required to remove all references to AIMA from the document but may include the following statement in the header on each page: “This questionnaire is based on AIMA’s Illustrative Questionnaire for the Due Diligence of Outsource Service Providers (2019).”**

The only exceptions to the general rule above are that:

* users presenting the DDQ in Word or PDF form may delete the rows containing the follow-on questions if they select the answer option in a question that signals to readers that template DDQ rows have been omitted;
* users may omit the pages containing the “Further Instructions” and the attached “Terms of Use” when presenting the filled in DDQ to recipients; and
* if desired, users may remove any “N/A” and “More” options that are not ticked in the first column to make the ones that are ticked easier to identify.

Please answer all the questions. For many questions, there is a requirement to provide additional commentary depending on your answer to a yes/no question. Please include the additional information in the text box provided for such questions. For other questions, there is an option to provide additional text if you want to, but the text boxes for those questions can be left blank if a further explanation is not required.

To add questions, please use the “further questions” function at the end of the relevant section(s).

To add comments or further information in response to individual questions where no text box has been provided for that purpose, please use the “comments” function at the end of the relevant section(s).

Please do not delete or amend any of the content control boxes (except as discussed above) even though this is possible to do.

The content controls used in this document were not available for versions of Word up to and including Word 2010. They may also not be available in “mini” versions of Word available through Office 365, Google Docs, and various tablet apps. In these situations, the content controls may or may not be visible and/or operable. If you accidentally delete a content control, any response that would have been in the content control will no longer be tagged correctly for data extraction. As the document is in Word, it is possible to insert text outside the content controls, although this is not recommended and may adversely affect an outsource provider’s ability to make certain of the certifications. Any response outside a content control will not be tagged correctly for data extraction and will detract from the usefulness of the information for some users.

Formatting

This DDQ has been formatted to fit on A4-sized paper. However, users that prefer Letter-sized paper can simply change the paper size. Please note that for best results this should be done on a section-by-section basis rather than simply changing it in a single place or changing it while having selected all.

Before finalising your document, you should:

* delete this “Further Instructions” section and the “Terms of Use” section below, as well as the section break that separates these from the DDQ’s signature block;
* place your mouse anywhere in the table of contents, right click your mouse, select the “Update field” option and select “Update page numbers only” to update the table of contents; and
* update the page numbers shown in the “To the reader” note included at the top of each section of questions by right clicking on the page number shown (inside the grey shadowed box representing the field code) and selecting the “Update field” option to update the page number.

 **Illustrative Questionnaire for the Due
Diligence of Outsource Service Providers**

# TERMS OF USE

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The table below shows how this questionnaire is permitted to be used.

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| --- | --- |
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| A vendor that is not an AIMA member obtains the blank DDQ (whether or not from an Authorised Investor or an AIMA member) and fills it in and provides it to anyone other than an Authorised Investor or a requesting AIMA member | **Not permitted** |
| ***Circulation by other service providers that are AIMA members*** |
| An employee of an AIMA service provider member provides it to another employee in the same office of that service provider member company for its internal use | Permitted use |
| An employee of an AIMA service provider member provides it to another employee in a different office of that service provider member company for its internal use | ***Permitted use if the receiving employee is in an office of the service provider that is itself an AIMA member; otherwise not permitted*** |
| An AIMA service provider member makes the blank DDQ available to a client that is an AIMA member | Permitted Use |
| An AIMA service provider member makes the blank DDQ available to a client that is not an AIMA member | **Not permitted** |
| ***Transformation to electronic form for onward circulation*** |
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| A non-AIMA member transforms the blank DDQ into an electronic format or other format to make available to its own clients that are not AIMA members | **Not permitted** |
| ***All other circulations and uses*** |
| Any person provides a blank or completed DDQ to anyone except in the permitted use circumstances set out above | **Not permitted**  |