KOR

Data Invalidation Policy | Version 1.0

Policy

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1.0 Overview

KOR TR^1 has established systems and User access restrictions reasonably designed to prevent any provision in a valid swap from being invalidated or modified through its verification or recording process. Client Agreements contain language intended to prevent any such invalidation or modification.

Every action taken by an internal or external User in a KOR TR system is recorded in an audit log. In order for external Users to have permission to submit and update data, their Administrative User must first grant their User access to a role that allows for the submission of data. Internal KOR User roles do not allow for the modification of data without the explicit written approval of the CCO and/or CEO. Such permissions are for a limited time and scope and are well documented.

KOR data maintains a single version of truth with topics in order to avoid conflicts of versions. The underlaying technology prevents any modification of data in any circumstances.

a. Kafka's topics work as append-only logs. Written messages to the log cannot be altered or deleted, not even by system admins.

b. All data gets written to S3 and S3 Glacier, using the Write Once Read Many (WORM) strategy. We use S3 Object Lock and S3 Glacier Vault to achieve WORM retention policies.

References: CFTC Rule(s) §49.10(d).
References: SEC Rule(s) 240.13n-5(b)(5).

KOR TR^1: Trade Repository (TR) is an all-encompassing term that includes Swap Data Repository (SDR) and Security Based Swap Data Repository (SBSDR) for which KOR Reporting Inc. is registered.

1.1 Appendix A: Exhibits

Regulator	Exhibit	Exhibit Description
CFTC	LL	Attach as Exhibit LL policies and procedures that are reasonably designed to prevent any provision in a valid swap from being invalidated or modified through the procedures or operations of the Applicant.
SEC	EE	Attach as Exhibit EE policies and procedures implemented by the applicant to prevent any provision in a valid security-based swap from being invalidated or modified through the procedures or operations of the applicant.