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Mr. Philippe Lebel
Secrétaire et directeur général des affaires juridiques
Autorité des marchés financiers
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Dear Mr. Lebel,

Please accept the following as Trans Union of Canada, Inc.'s ("**TransUnion**") submission to the Autorité des marchés financiers ("**AMF**") to the Publication for consultation of the second draft of the *Regulation respecting complaint processing and dispute resolution in the financial sector*.

Below we address our understanding of the definition of complaint, as well as of the maintenance of the complaints register, following review of the draft regulation and our meeting with the AMF.

A. DEFINITION OF COMPLAINT

TransUnion understands that the original intent and scope of the definition of complaint remains intact despite deletion of the second paragraph of the original definition, which contained exclusions applicable to credit assessment agents.

Amending regulations to include new or evolving exceptions to an exhaustive list is a time-consuming process and as such, TransUnion agrees that those exclusions would be better captured through another instrument conferring the AMF the necessary agility and flexibility to update such list of exclusions, such as the AMF's website, guidelines or interpretation bulletins.

B. COMPLAINTS REGISTRY

Following our conversation, clarity was given on the requirements arising from Section 18 pertain to TransUnion's internal registry only.

TransUnion acknowledges that the AMF's expectations on the interpretation of entering complaints in such internal register "*without delay*" is equivalent to "as soon as possible", as opposed to registration in real-time (i.e. as soon as a complaint is received and prior to its analysis).

Complaints received during the week-end, for instance, would be expected to be registered in one or two business days ideally.

Conclusion

Thank you for the opportunity to provide comments on the draft *Regulation respecting complaint processing and dispute resolution in the financial sector*; we would be happy to discuss further should you require additional information or clarification on the above.

Sincerely,



Thiên-Kim Nguyen
Legal Counsel

TRANS UNION OF CANADA, INC.