



August 2, 2019

The Secretary  
Ontario Securities Commission (OSC)  
20 Queen Street West, 22<sup>nd</sup> Floor  
Toronto, ON M5H 3S8  
By email: [comments@osc.gov.on.ca](mailto:comments@osc.gov.on.ca)

Me Anne-Marie Beaudoin  
Corporate Secretary,  
Autorité des marchés financiers  
800, rue du Square-Victoria, 4e étage Place Victoria  
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By email: [Consultation-en-cours@lautorite.qc.ca](mailto:Consultation-en-cours@lautorite.qc.ca)

**[Re: Proposed National Systems Renewal Program Rule and Related Amendments](#)**

Dear Sir/Madame:

VigilantCS welcomes this opportunity to share its insights and viewpoint about the Proposed National Systems Renewal Program Rule and Related Amendments (NSRP) – NI 13-103

VigilantCS is a Canadian regtech company that provides innovative staff compliance platforms for the financial services industry. We have been operating since 2016 and ours was one of only three Canadian firms named to the RegTech 100 list by FinTech Global in 2018.

Our solutions automate registration management, continuing education, conflict of interest and complaints and incidents. They deliver other core staff regulatory requirements that support compliant professional behavior, which protects the interests of investors. They do so by functioning as the middleware for registered firms. Our clients can therefore fulfil their regulatory obligations, while decreasing costs, improving controls and analytics and gaining insights into their compliance culture.

**[A Flexible Open Architecture is the Best Solution](#)**

The NSRP is a major undertaking and will provide long-term added value to industry, regulators—and ultimately investors—if an open architecture path is chosen. We encourage the CSA to build the system, including NRD functionality, with API and data governance standards accessible to financial service companies *and* regtech solution providers.

We recommend building a platform that contemplates future changes or added functionality based on specific stakeholder requests. The middleware structure should permit firms or regtech providers to build a “translation layer” with a flexible technology stack. This will allow regulators to adapt future requirements for overseeing regulatory systems and improve data quality, while avoiding the need to constantly re-engineer systems.



Firms, in turn, will avoid added costs and delayed time to availability when regulatory amendments are made. This efficiency will enable them to focus on their primary mandate: serving their clients. Firms will also be equipped with strong controls aligned with regulatory requirements and the ability to translate their regulatory data into analytics to better understand their business.

### Open Architecture is a Win-Win-Win Solution

VigilantCS values the work of the CSA and respects the contributions and diverse perspectives of other stakeholders. But, we want to underscore our well-founded convictions, which are driven by technical expertise, deep sector knowledge and in-the-field experience:

- By incorporating an open structure and standards, the NSRP system will achieve a triple win for regulators, industry and the investors CSA exists to protect.
- By allowing for an API structure and clear and accessible data governance standards, the CSA can enhance controls, decrease the cost of compliance and improve the quality of resulting analytics that allows firms to self-manage more effectively.

Questions or comments in response to this submission by the CSA or the individual commissions are welcomed and may be directed to me. Thank you again for the opportunity to share our outlook.

Yours truly,

*Robert Kirwin*

Robert Kirwin, LLB, MBA  
Chief Executive Officer, Co-founder  
VigilantCS

CC: Geoff Pille, Co-founder & Chief Technology Officer