



Fintechs Canada

British Columbia Securities Commission

May 19, 2025

Alberta Securities Commission

Financial and Consumer Affairs Authority of Saskatchewan

Manitoba Securities Commission

Financial and Consumer Services Commission of New
Brunswick

Superintendent of Securities, Department of Justice and Public
Safety, Prince Edward Island

Nova Scotia Securities Commission

Office of the Superintendent of Securities, Service NL

Northwest Territories Office of the Superintendent of Securities

On behalf of Fintechs Canada, I would like to thank you for the opportunity to comment on the Canadian Securities Administrators' (CSA) [discussion paper](#) on data portability ("CSA Multilateral Discussion Paper 11-406 — CSA Financial Innovation Hub Introduces Collaboratory and Data Portability Test").

Fintechs Canada serves as the collective voice for the most innovative financial technology companies. Serving millions of Canadians from coast-to-coast-to-coast, our membership consists of market-leading Canadian fintechs, fintech-friendly financial institutions, the technology companies that power the credit union space, and global fintech companies, among others. Our mission is to assist Canadians in accessing a financial sector that is more responsive to their needs, as well as one that is stable and secure.

We strongly support the CSA's goal of "building regulatory capacity for emerging digital business models with the aim of supporting innovation in the Canadian capital markets."



Executive Summary of Positions

Theme	Position	Rationale
Avoiding duplicative and conflicting standards	The CSA should not introduce standalone technical or governance standards for data portability or e-KYC.	Fragmented, regulator-specific standards would raise compliance costs, limit network effects, and undermine the goal of seamless client-driven data flows.
Regime uncertainty	It is premature to assess potential conflicts between securities requirements and federal rules.	Canada's open banking legislation is only partially passed. Until the federal framework is finalized, any CSA rule-making risks duplicating or diverging from forthcoming federal instruments.
Necessity of live test	A CSA-run live testing sandbox is unnecessary at this stage.	Client-directed data sharing has occurred through screen scraping for nearly a decade without systemic harm. With federal oversight imminent, the added value of CSA supervision at this time is questionable.

Detailed comments

Avoiding duplicative standard-setting

The discussion paper contemplates that “a unified comprehensive technical standard may be more efficient, secure and less burdensome” for registrants.



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We agree and note that the Department of Finance's consumer-driven banking framework explicitly mandates one national, interoperable technical standard.

Creating a securities-specific data-portability or e-KYC standard risks fragmentation across technical, legal, and supervisory lines. We urge the CSA to participate in the federal policymaking and standard-setting process rather than develop its own rules and standards.

Prematurity of conflict analysis

Identifying potential overlaps or conflicts in data portability requirements is premature, as federal policymaking and standard-setting for consumer-driven banking remains incomplete. Until the full legislative and regulatory framework, technical standards, and FCAC guidance are released, CSA-led interventions risk misalignment.

We recommend that the CSA postpone any rulemaking or standard-setting until federal details are finalized, and commit to aligning with the federal and CRO frameworks once they are in place.

Utility of CSA live test

A live testing environment is unnecessary, as market data sharing is already taking place through screen-scraping. With federal oversight imminent, data-sharing will soon be subject to more robust and consistent standards. It is unclear why the prospect of stronger regulation would justify introducing live and supervisory testing for a practice that has operated for years without oversight.

We encourage the CSA to consider whether its objectives could be met more effectively through roundtables or targeted exemptions, rather than live testing.

Fintechs Canada would welcome the opportunity to engage in Phase 2 roundtables. We applaud the CSA for proactively engaging the market on



data portability. By coordinating with federal efforts and pacing intervention alongside legislative progress, securities regulators can safeguard investors and foster innovation. We remain available to elaborate on our views and look forward to further engagement.

Sincerely,

Alex Vronces
Executive Director, Fintechs Canada