



As a registered credit assessment agent in Quebec that is also registered as a credit agency in every other applicable Canadian jurisdiction, Equifax Canada take our role very seriously and serve as a consumer advocate, steward of financial literacy and champion of economic advancement. We always welcome the opportunity to provide comments on regulatory oversight and practices. We were however surprised by this request to comment on the Annual Disclosure Template and the Semi-Annual Disclosure Template given that in our previous discussions you seemed to confirm that the forms were final and you agreed with our approach for the response content.

See some items below:

### **Annual Disclosure Template**

**Issue 1:** As an organization that operates nationally it is impractical and would create an undue hardship on our business practices and procedures to report in tab 1600 from a Quebec only perspective. We have appreciated the AMF's past acceptance of financial information, as prepared for our organization representing our total Canadian operations and recommend the form clarify that this information may be provided for Quebec only, if available.

**Issue 2:** Equifax interprets Chapter III, Division I of the Credit Assessment Agent's Act (the "Act") as setting out the "assessment purposes," more specifically, the rights of consumers to access a report or score and to place a security alert, credit lock or consumer statement on the file. These rights do not involve financial institutions and are exercised by the consumer with the Equifax directly. Equifax continues to request clarity as to the meaning of providing "Number of Quebec consumer credit files by financial institution for assessment purposes" identified in tab 4040 so that we can understand what to report and how it is related to the AMF's oversight of our commercial practices and function as a credit assessment agency in Quebec.

**Issue 3:** Equifax continues to request clarity on tab 4050 and more specifically the rationale and legal basis for requesting "Products by Financial Institution, Banks and Telco." More specifically, Equifax understands that the scope and purpose of the Act is oversee Equifax's commercial practices insofar as it relates to the consumer rights set out in the Act. Our agreements with our customers (Financial Institutions, Banks and Telco) contain confidentiality clauses that restrict disclosure of information such as "product purchases" unless required by law. To comply with this covenant and to comply with our internal policies on confidential information handling, we do require, in writing the legal authority supporting the disclosure of this information to be provided to us from the AMF.

### **Semi-Annual Disclosure Template**

To the extent the above items appear in the semi-annual disclosure, the same comments apply.



Equifax Canada Co.