



State Street Trust Company
Canada

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February 9, 2022

Office of the Superintendent of Financial Institutions
255 Albert Street
12th Floor
Ottawa, Ontario
K1A 0H2

Via electronic submission: Tech.Cyber@osfi-bsif.gc.ca

Re: Consultation on OSFI B-13 Technology and Cyber Risk Management Guideline

Dear Sir/Madam:

State Street Corporation (“State Street”) welcomes the opportunity to comment on the consultation issued by the Office of the Superintendent of Financial Institutions (“OSFI”) regarding the draft B-13 Technology and Cyber Risk Management Guideline (the “Guideline”) related to OSFI’s expectations for sound technology and cyber risk management.

Headquartered in Boston, Massachusetts, State Street is a global custody bank which specializes in the provision of financial services to institutional investor clients. This includes investment servicing, investment management, data and analytics, and investment research and trading. With \$42.6 trillion in assets under custody and administration and \$3.9 trillion in assets under management, State Street operates in more than 100 geographic markets¹. In Canada, State Street provides global custody and local financial services through its wholly-owned subsidiary, State Street Trust Company Canada, a Canadian federal trust company, as well as the Schedule III foreign bank branch of State Street Bank and Trust Company, and State Street Global Markets Canada Inc., which provides brokerage services. In addition, we offer investment management services through State Street Global Advisors, Ltd., a wholly-owned subsidiary, and front-to-back portfolio and risk management solutions through Charles River Development, both of which have offices in Toronto.

We provide below brief responses to each of the topics for which OSFI requested feedback from our perspective as a global custody bank servicing institutional clients.

¹As of June 1, 2021.

Please feel free to contact me at rbaillie@statestreet.com should you wish to discuss the contents of our letter in greater detail. We welcome the opportunity to further engage with OSFI on this topic and we stand ready to provide whatever assistance may be appropriate.

Respectfully,



Robert J. Baillie

cc Geoff Behm, Principal Officer
State Street Bank and Trust Company – Canada Branch

1. Clarity of OSFI's expectations as set out in the Draft Guideline

OSFI's expectations set out within the Guideline and the five domains provide clear and comprehensive guidance as it relates to technology and cyber risk management.

2. Application of these expectations, commensurate with the institution's size, nature, scope and complexity of operations

Federally Regulated Financial Institutions ("FRFIs") that are part of a global regulated financial institution parent group ("RFIP") as defined in OSFI's B-10 Outsourcing of Business Activities, Functions and Processes Guideline may be subject to and benefit from comprehensive global technology and cyber strategies; global technology and cyber risk management frameworks, policies, standards and procedures; and global technology and cyber security operations at the parent organization within their RFIP group. These FRFIs may focus on local management and Board of Directors oversight of the centralized management of technology and cyber risks by their parent organizations. Perhaps OSFI would consider acknowledging the acceptability of this global approach to technology and cyber risk management within the Guideline.

3. Balance between principles and prescriptiveness in OSFI's expectations

We believe OSFI has struck an effective balance between technology and cyber risk management expected outcomes and supporting principles and prescriptive guidance.

4. Other suggestions that contribute to OSFI's mandate to protect depositors and policyholders, and maintain public confidence in the Canadian financial system

As technology and cyber risks, and information technology systems and infrastructure, are inherently global in scale they should be supervised as such. We encourage the OSFI to continue to coordinate with their counterparts in other jurisdictions on harmonized policy and supervisory frameworks as they finalize the Guideline.