



INTERNATIONAL FINANCIAL
DATA SERVICES

27 January 2016

Via e-mail: invfirmspolicy@centralbank.ie

Investment Firms Regulations Consultation
Market Policy Division
Central Bank of Ireland
Block D Iveagh Court
Harcourt Road
Dublin 2

Consultation Paper 97 – Consultation on Central Bank Investment Firm Regulations 2015- “CP97”

Dear Sir or Madam,

International Financial Data Services (Ireland) Limited (“IFDS Ireland”) welcomes the opportunity to respond to the above consultation paper.

As a reminder, IFDS Ireland provides Transfer Agency (“TA”) services to directly contracted clients and to clients of State Street Fund Administration Services (Ireland) Limited (“SSFSIL”) where SSFSIL has engaged IFDS Ireland to provide TA services.

The ultimate parent companies of IFDS Ireland are State Street Corporation (“SSC”) and DST Systems Inc. (“DST”).

We are writing in support of the feedback on CP97 submitted separately by SSFSIL. IFDS Ireland has liaised with SSFSIL in drafting its feedback in areas relevant to IFDS Ireland’s business. Areas specifically relating to Fund Accounting such as release of Net Asset Values (“NAVs”) are outside of IFDS Ireland’s direct experience and for this reason, IFDS Ireland cannot comment on SSFSIL’s feedback in these areas.

International Financial Data Services is the trading name of: International Financial Data Services (Ireland) Limited
Registered in Ireland 179786, authorised by the Central Bank of Ireland under the Investment Intermediaries Act 1995.


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Please do not hesitate to contact me on ddonachie@statestreet.com or 01 776 8344 if you have any queries.

Kind Regards,



David Donachie,

Head of Compliance.