



**INTERNATIONAL FINANCIAL**  
DATA SERVICES

January 31, 2019

**Central Bank of Ireland Discussion Paper: Outsourcing – Findings and Issues for Discussion**  
**Regulated Entity: International Financial Data Services (Ireland) Limited– C20886**

Dear Sir or Madam,

We welcome the publication of the above paper and would like to thank the Central Bank for the opportunity to contribute to the discussion process.

We are writing to endorse and support the separate submissions made by State Street Corporation and Irish Funds.

International Financial Data Services (Ireland) Limited (“IFDSI”) is regulated by the Central Bank as an investment business firm and provides transfer agency services to Ireland-domiciled funds and non-Ireland domiciled funds as an outsourcing service provider to State Street Fund Services (Ireland) Limited and International Financial Data Services (Luxembourg) S.A. In addition, IFDSI directly contracts as a Transfer Agent for one set of Irish domiciled funds. IFDSI is held within a corporate joint venture. The ultimate parents of IFDSI are State Street Corporation and SS&C Technologies, Inc. IFDSI is also an active member of Irish Funds.

We have carefully reviewed the discussion paper and consulted with State Street Corporation and Irish Funds. As part of the consultation process, we contributed both to the State Street Corporation and the Irish Funds submissions. We confirm our support of their submissions as Transfer Agent and Outsourcing Services Provider.

Kind regards,

David Donachie  
Head of Compliance  
International Financial Data Services (Ireland) Limited

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