

Wealthsimple

BY ELECTONIC MAIL

May 23, 2017

Ontario Securities Commission

Attn: Robert Day Senior Specialist Business Planning

Re: Ontario Securities Commission (the OSC) Draft Statement of Priorities for Financial Year to End March 31, 2018 (the Statement) – Request for Comments

Wealthsimple Inc. is encouraged by the OSC LaunchPad initiative and the OSC's participation in the CSA's Sandbox and believes that these policy initiatives will support the growth of Canadian Fintech. We support each of the priorities listed in the Statement and would like to highlight two items that we recommend adding: account transfers and electronic signatures.

Standardize the Account Transfer Process

Ideally a transfer should take 30 days to complete. Since Wealthsimple started business in 2014, over 470 account transfers have taken 120 days or more to complete. While IIROC Rules contain timelines that dealers must meet when a transfer request is made, other registrants do not have to meet any specific timelines. As a result, accountholders are uncertain what documents must be used or when their transfers will be completed.

We recommend the OSC establish rules on account transfers including timelines and documents.

Acceptance of other Firm's Electronic Signatures

Clients are drawn to the efficiency and convenience of online advice because they can open their accounts online from the comfort of their home or office. Electronic signatures are key to this client experience. While IIROC and MFDA rules permit the use electronic signatures, these dealers and registrants are not required to accept their client's electronic signature on another firm's transfer document. Until all firms are required to accept electronic signatures that meet prescribed standards, some firms will choose to reject their own client's electronically signed transfer forms.

We recommend the OSC establish rules requiring firms accept electronic signatures.

Conclusion

Only the OSC has the regulatory authority to establish common standards for transfers and electronic signatures that would apply to all registrants. These standards could form the basis for other online activities between other regulated firms and would build on Ontario's reputation as a global Fintech leader.

Yours very truly,

WEALTHSIMPLE INC.

Michael Holder

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Associate General Counsel and Chief Compliance Officer

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