



**Privacy Statement  
Certification**

## **DSI Foundation**

The DSI Foundation (hereafter referred to as: DSI) is a self-regulatory institute. DSI's mission is to promote and monitor the integrity, expertise, and professionalism of the individuals employed in the financial sector.

DSI provides services in the fields of screening, certification, and ethics enforcement.

This privacy statement applies to all processing of personal data by DSI in the context of the certification process.

The party responsible for processing such data is DSI, with its statutory address at Beursplein 5, 1012 JW Amsterdam.

## **Certification by DSI**

Individuals employed in the financial sector may request certification by DSI. The individual must be employed by an organisation registered as a DSI Participant.

- 1) DSI maintains the following three public registers for employees who do not advise or inform professional investors:
  - Retail Investment Advisor Custom Products;
  - Retail Investment Advisor Standard Products;
  - Retail Information Provider.
- 2) DSI maintains the following four public registers for employees who advise or inform professional investors:
  - Institutional Investment Advisor;
  - Institutional Information Provider;
  - Treasury Investment Advisor;
  - Treasury Investment Information Provider.
- 3) DSI maintains the following four additional public registers:
  - Security Broker;
  - Investment Analyst;
  - Compliance Professional;
  - Integrity Register Certification.

Certification requests for the registers listed under 1) and 2) are subject to the covenant between AFM and DSI regarding the ESMA Guidelines for the evaluation of knowledge and competency dated 20 July 2017.

DSI also maintains a Participants Register. This public register lists the individuals who meet the participation requirements formulated by DSI.

## **Certification request**

The certification applicant (hereafter referred to as: the applicant) can initiate the certification process him-/herself in the MijnDSI environment. There, an applicant can begin a certification process, whereby he/she must enter information about him-/herself pertaining to various predetermined certification aspects. This includes information about the applicant's education, work history and integrity.

DSI will then check the information provided by the applicant. Employers in the financial sector have a decisive interest in being able to determine the competency and integrity of their current and future employees and contractors.

If the certification request is granted by DSI, then the individual is entered in the public DSI register. The public register lists information such as the certified individual's name and position. The public can search this register by the certified individual's name.

## **Purposes**

DSI processes personal data for the purpose of handling a certification request. The certification request consists of two components; a screening followed by the evaluation of the certification application.

The screening process includes the verification of the individual's work history and a diploma verification. The terms and provisions of the Screening Privacy Statement apply to the screening. Certification shows that the employee has met the competency and integrity requirements stipulated by DSI.

## **Which personal data do DSI process?**

The following personal data are processed by DSI:

- first name, last name, date of birth, gender, and nationality;
- address and place of residence;
- e-mail address and telephone number;
- account details for the MijnDSI environment;
- proof of identification and document number\*;
- data pertaining to education and exams pertinent to the certification;
- data pertaining to the past 5 years of employment history;
- data pertaining to the Certificate of Good Behaviour (VOG) or a foreign equivalent;
- data regarding a case before the DSI Ethics Committee or the DSI Appeals Committee;
- data regarding measures imposed by the DSI Ethics Committee or the DSI Appeals Committee;
- data pertaining to any previous DSI certification;
- data from the bankruptcy register;
- data regarding the applicant's own statement.

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\* DSI is not authorised to process the applicant's citizen service number (BSN). DSI therefore requests that the applicant make his/her BSN and passport photo illegible.

## **Grounds**

The personal data listed above are necessary for DSI to be able to honour a certification request. As a result, the personal data listed above must be processed in order to honour the agreement between the certification applicant and DSI.

DSI shall only share personal data with educational institutions and current or former employers if the applicant has granted DSI written authorisation to do so.

Inasmuch as DSI processes criminal law data in the context of a certification request, the exclusion clauses of Article 33, section 2, sub a of the General Data Protection Regulation Implementation Act shall apply.

## **Who has access to my data?**

The persons who shall have access to your personal data are the certification department staff and supervisors employed by DSI. The applicant shall also have access to the data stored in the MijnDSI environment.

In order to verify specific elements of the certification process, DSI must share the strictly necessary personal data, such as the applicant's first and last name, with educational institutions and current or former employers. These personal data shall only be shared if the applicant has granted DSI written authorisation to do so.

Via the public register, the public has access to the certified individual's name, position, employer and certification status.

DSI also shares certain data with the Participant, such as your name, date of birth, and the status of the certification procedure. DSI will also share whether the applicant has met the examination requirements for knowledge, competency and integrity with the Participant.

Sharing these data with the Participant is necessary in order to serve the justified interest of a third party. Financial supervision regulations require Participants to ensure that their employees are competent and honest. Financial supervision regulations require Participants to ensure that their employees are competent and honest. The Participant therefore has a justified interest in viewing the status of the certification and the education and examinations necessary to earn and maintain the certification status. This information allows the Participant to determine the competency and integrity of its employees.

DSI may utilise the services of third parties for the processing of personal data, in accordance with this privacy statement. In such a case, these third parties shall act as a data processor on behalf of DSI. DSI has signed a processing contract with these third parties.

## **Storage periods**

DSI shall store the individual's personal data for as long as the employee is listed in the DSI certification register.

If the certified individual decides to terminate the certification, then his/her personal data will immediately be deleted from the public register. The data will be deleted from the DSI administration after three years.

DSI will store the following personal data for longer than three years: name, address and place of residence, date of birth, e-mail address and certification history. This data is stored in order to facilitate certified individuals' obligation to abide by the DSI Code of Conduct, which includes norms in the areas of integrity and competency. Non-compliance with these norms may result in disciplinary measures. These measures may also be implemented after certification has been terminated, for example if a violation of the Code of Conduct occurred during a period in which the individual was certified. The personal data will be definitively deleted after five years.

## Security measures

DSI will implement suitable technical and organisational measures to secure the personal data against loss or any form of unauthorised use. These measures will guarantee a suitable security level with regard to the risks of use and the nature of the data to be protected, taking the state of the technology and the costs of implementation into consideration. The measures are intended in part to prevent the unnecessary collection and further processing of the personal data.

## Confidentiality

Any person who has access to personal data in the context of his/her work for DSI is required to maintain confidentiality and to sign a confidentiality statement to that end. All DSI employees have also been screened themselves.

## Your rights

Any person may submit a request to DSI to:

- view his/her personal data;
- edit, improve, and/or add to incorrect personal data;
- delete personal data if: they are no longer needed for the purpose for which they were collected or used, have been used without authorisation, or if the personal data must be deleted in order to comply with a legal obligation laid down in European Union or Member State law which lies with the party responsible for processing the data;
- withdraw permission previously granted to share the personal data;
- limit (temporarily) the processing of the data if: the accuracy of the data is contested, the processing is unauthorised and the individual protests the deletion of the data, or when the party responsible for processing the personal data no longer requires it for the purpose of processing, but it is still needed for submitting, exercising, or justifying a legal claim;
- finally, the individual retains the right to object to the sharing of the status of the certification with the Participant for reasons pertaining to his/her specific situation.

In that event, the processing party shall cease processing the personal data unless he/she can present urgent and justified grounds for such processing that outweigh the interests, rights and liberties of the individual concerned or that relate to the initiation, execution or justification of a legal claim. For such requests, please contact the certification team coordinator at: M.Schrijen@dsi.nl.

DSI will only process a request if the applicant can provide a copy of his/her legally valid proof of identification\*. DSI will honour the request within four weeks of receipt of the request, unless there are grounds on which the request cannot be honoured. In the event that DSI refuses to honour the request, the reasons for such a refusal shall be provided to the applicant. DSI is authorised to charge reasonable costs for the processing of a request if additional copies are requested or if the request is unjustified or excessive.

## Disputes

In the event that an applicant is of the opinion that DSI has acted in violation of the privacy statement or the applicable law, or has treated him/her in an incorrect manner, then the applicant may make his/her grievances known in accordance with the DSI complaints regulation. You also have the right to submit a complaint to the Personal Data Authority (AP).

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**Contact details**

For questions pertaining to this privacy statement or requests regarding your rights, please contact the privacy protection assistant at [privacy@dsi.nl](mailto:privacy@dsi.nl).

**Approval and amendment**

The privacy statement was approved by the Board of DSI and can be amended by the Board of DSI. This privacy statement was last amended on 6 May 2019.