



Screening Privacy Statement

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 screening process.

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

DSI Screening

Individuals eligible for an integrity-sensitive position in the financial sector may request a screening by DSI. The screening applicant (hereafter referred to as: the applicant) can initiate the screening process him-/herself in the MijnDSI environment. There, an applicant can begin a screening process, whereby he/she must enter information about him-/herself pertaining to various predetermined screening aspects.

DSI then screens the applicant for issues in accordance with a standard for the financial sector. Employers in the financial sector have a major interest in having their current and future employees and contractors evaluated with regard to reliability and integrity.

DSI will only share the objective factual findings of the screening with the applicant by means of a digital authenticated screening report. The applicant may then choose whether or not to share the screening report with his/her current or future employer or client. If the applicant does not wish to share the results of the screening with his/her employer or client, then the employer or client will obtain no knowledge about the content of the screening.

DSI encourages employers and applicants to discuss the results of the screening with one another before making decisions.

Purposes

DSI processes personal data for the purpose of conducting a screening. The screening process includes the verification of the Certificate of Good Behaviour (VOG), a work experience reference check, a diploma verification, and a check of whether the applicant is registered in the DSI registers. The screening report issued by DSI serves as proof that the applicant has met the requirements of the reliability procedure required 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 number¹;
- data pertaining to study programmes;
- 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 DSI certification;
- data from the bankruptcy register;
- data regarding the applicant's own statement.

Grounds

The personal data listed above are necessary for DSI to be able to honour a request for a screening. As a result, the personal data listed above must be processed in order to honour the agreement between the screening 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 screening 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 screening officers 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 screening process, DSI must share the strictly necessary personal data, such as the applicant's first and last name, with educational institutions and current

¹ DSI is not authorised to process the applicant's citizen service number (BSN) or passport photo. DSI therefore requests that the applicant make his/her BSN and passport photo illegible.

or former employers. These personal data shall only be shared if the applicant has granted DSI written authorisation to do so.

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 period

Financial supervisory legislation includes an obligation for businesses to come to a justified evaluation of the reliability of persons in integrity-sensitive positions prior to their employment. DSI's statutory purpose is to reinforce confidence in the financial services sector. The conduct of an employee screening by DSI contributes to this goal. Based on the above, DSI will store personal data for five years after the issue of a screening report.

DSI will also store the personal data pertaining to the screening in order to better process any future screening requests by the applicant.

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;

For such requests, please contact the screening team coordinator at: M.Dunning@dsi.nl.

DSI will only process a request if the applicant can provide a copy of his/her legally valid proof of identification². 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).

Contact details

For questions pertaining to this privacy statement or requests regarding your rights, please contact the data protection officer at 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 12 December 2019.

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