



# DSI Privacy Statement

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# General

## 1.1. 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, training and ethics enforcement.

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

In the first section of this privacy statement, you can read about the type of products and services DSI offers, personal data security, confidentiality and the rights of stakeholders. In the following sections, you can read which of your personal data we process for each product or service, for which purposes, on what grounds, who has access to your personal data, and the storage periods that apply to the product or service.

Section 2: Information about maintaining relationships

Section 3: Information about screenings

Section 4: Information about certifications

Section 5: Information about ethics enforcement

Section 6: Information about training courses

## 1.2 Security of personal data

DSI implements suitable technical and organisational measures to secure your personal data against loss or any form of unauthorised use. These measures provide a suitable level of security and are intended to prevent the unnecessary collection of personal data or unauthorised access to personal data, for example.

## 1.3 Confidentiality

Every DSI employee who needs access to personal data in order to perform their work is required to maintain confidentiality and has signed a non-disclosure agreement. Our employees are also required to pass our screening procedure.

## 1.4 Your rights

When we process your personal data, you retain the right to:

- view your personal data;
- change, improve or add to incorrect personal data;
- delete your personal data;
- limit the processing of your personal data;
- object to the processing of your personal data;
- transfer your personal data.

If you wish to exercise one of your privacy rights, you can submit a request via [privacy@dsi.nl](mailto:privacy@dsi.nl). In order to prevent privacy violations, we must verify your identity before processing your request. We do that by asking you to provide a secure copy of your identification document. You can include a secure copy of your identification document with your request as an e-mail attachment. The copy should not show a photo or Citizen Service Number (BSN).



# Algemeen

You can expect a reply to your request within one month. If we cannot process your request within the one month period, we will inform you of when you can expect a reply. If we cannot comply with your request, you will also receive a notification explaining the reasons.

## 1.5 Complaints

If you have a complaint about DSI's processing of your personal data, or if you believe that DSI has acted in violation of privacy law or our privacy statement, then you may submit a complaint to us in accordance with the DSI complaint regulations.

If you disagree with the way that DSI has processed the complaint, then you may also submit a complaint to the Data Protection Authority.

## 1.6 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).

# Maintaining relationships

This section of the privacy statement applies to all processing of personal data by DSI in the context of maintaining relationships, for example if someone purchases a product from us or enters information via our website requesting that we contact them or send them a newsletter.

## 2.1 Purposes

DSI processes personal data in order to maintain our relationships and to send information to persons who enter the data on our website. We also process personal data when someone enters their (contact) details on our website, sends us an e-mail and/or receives our newsletter, information documents and e-mail notifications.

## 2.2 Which personal data does DSI process in order to maintain relationships?

When you sign up to receive information, we process the following personal data:

- First name, last name, prefix
- (Business) e-mail address
- Company name
- Optional: Title
- Optional: (business) telephone number
- Optional: gender

When you sign up for the DSI newsletter, we process the following personal data:

- First name, last name, prefix
- (Business) e-mail address
- Company name
- Optional: gender

When you contact us via e-mail at [info@dsi.nl](mailto:info@dsi.nl), we process the following personal data:

- First name, last name, prefix
- (Business) e-mail address
- Any other personal data you include in the e-mail content.

If you have purchased a service from DSI in the past, we process the personal data that are necessary to provide the service; the details are included in the privacy statement for that specific service. We may also contact current and former relations for the purpose of relationship management. In that case, we process the following personal data:

- Contact person's first name, last name and prefix
- Optional: gender of the contact person
- (Business) e-mail address
- Optional: (business) telephone number
- Company name



# Maintaining relationships

## 2.3 Grounds for processing

If you have signed up to receive information or a newsletter, or if you enter your details in a (contact) form on our website, then the grounds for processing is 'Permission'. You may revoke your permission at any time by clicking on the 'unsubscribe' link at the bottom of the message. You can also send an e-mail to [communicatie@dsi.nl](mailto:communicatie@dsi.nl). Please remember to inform us which information you no longer wish to receive.

When we contact you for the purpose of relationship management, we will process your data on the grounds of our justified interest. Maintaining current and former relationships serves the interest of our operations in the form of providing our services and informing relationships about current and new services.

## 2.4 Access to and sharing personal data

Your personal data may only be accessed by those DSI employees whose work requires them to have access to your personal data. You provided these data to us yourself.

DSI may utilise the services of third parties for the processing of personal data, in accordance with this privacy statement. These third parties include companies that help us build and maintain our website or the system we use for our administration. 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.

## 2.5 Storage period

If we process your data on the grounds of permission, then we will delete your data within 1 month after you have signed up for the content or newsletter.

If we process your data on the grounds of justified interest, then we will delete your data in accordance with the storage periods for screening, certification and training. See sections 3.5, 4.5 and 6.5 of this privacy statement for more information.

If you wish to exercise your right of objection, we will stop contacting you for the purpose of relationship management and we will only continue to store your data if the data are subject to a storage period for screening, certification or training.

# Screening

Individuals who wish to request a DSI certification or change their certification must complete a screening process. You can initiate the screening yourself (perhaps in response to an invitation e-mail received from your employer) via the MijnDSI environment. To begin the screening, enter the requested personal details in the MijnDSI environment.

The screening procedure will then be conducted by Validata Group B.V. (hereafter: Validata). Validata conducts the screening based on screening profiles drawn up by DSI. Employers in the financial sector have a major interest in having their current and future employees and contractors with a DSI certification evaluated with regard to reliability and integrity.

To have Validata begin the screening process, DSI will provide them with the following details about you: first name, last name, date of birth, e-mail address and telephone number. Validata will then conduct the screening in accordance with the Validata privacy statement. This statement is posted on the Validata website.

The results of the screening are objective and factual, and will be included in a digital screening report. Validata will only share the screening report with you and DSI. You are free to decide whether or not to share this report with your current or future employer or client. If you do not wish to share the results with your employer/client, then your employer/client will not know the results of your screening.

## 3.1 Purposes

DSI processes your personal data to conduct a screening at your request. 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.

## 3.2 Which personal data does DSI process when conducting a screening?

When you request a DSI screening, we will receive your screening report from Validata. We process the following personal details:

- First name, last name, date of birth, gender, and nationality;
- Address and place of residence;
- E-mail address;
- Telephone number;
- MijnDSI account details;
- Secure copy of proof of identification (without BSN and photo) and document number;

# Screening

- Data pertaining to education;
- Data pertaining to your past 5 years of employment history;
- Data pertaining to the VOG or equivalent foreign document;
- Data pertaining to measures imposed by the DSI Enforcement Committee or the DSI Appeals Committee;
- Data pertaining to DSI certification;
- Data from the bankruptcy register;
- Data pertaining to your own statement.
- Payment details

## 3.3 Grounds for processing

When you request a DSI screening, you enter into an agreement with us regarding the conduct of the screening. In order to implement this agreement, we must be able to process the personal data listed above. That means the grounds for processing your personal data is: the implementation of an agreement.

To the extent that we process criminal law data pertaining to you, we will only do so to comply with your request to conduct a screening and issue a screening report. This exception to the prohibition of processing criminal law data can be found in Article 33, section 2 sub a of the General Data Protection Regulation Implementation Act (hereafter: GDPR Implementation Act).

## 3.4 Access to and sharing personal data

Your personal data may only be accessed by those DSI employees whose work requires them to have access to your personal data. These are: the customer care officers, their supervisors, and the system administrator.

You also have access to your own personal data via the MijnDSI environment.

In order to verify specific elements of the screening process, we may share the strictly necessary personal data, such as the applicant's first and last name, with educational institutions and current or former employers.

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.

## 3.5 Storage period

Once a screening has been conducted on your behalf and you have received a screening report from Validata, we will store the screening report and the personal data provided by you for that purpose for as long as you are certified and listed in one of our public registers.

If we have not granted DSI certification, then we will store the personal data and documents provided by you for a period of **one year**.

If you ask us to terminate your certification, we will delete the personal data and documents provided by you from our administration after a storage period of **three years**.



# Certification

If you work in for a company active in the financial sector, you may request certification by DSI on the condition that you are employed by an organisation registered as a DSI Participant. If you request certification, then you must initiate the certification process yourself by submitting an application via the MijnDSI environment. When you begin the certification process, you must enter information about yourself for each certification element. This includes information about your education, work history and integrity, for example.

DSI will verify the information you provide. If we grant your request for certification, then you will be added to the DSI public register. The public register lists information such as your name and job title. The register is searchable by name.

DSI maintains a variety of registers for certification, as listed in the General Regulations. DSI also maintains a Participants Register.

## 4.1 Purposes

We process your personal data in response to your certification application. This consists of two elements: a screening and an evaluation.

During the screening, DSI will verify information such as your work history and education. For more information about the processing of personal data for screening purposes, see Section 3 of this privacy statement.

Certification shows that you have met the competency and integrity requirements stipulated by DSI.

## 4.2 Which personal data does DSI process as part of a certification?

When you request a DSI certification, we will process the following personal data:

- First name, last name, date of birth, gender, and nationality;
- Address and place of residence;
- E-mail address;
- Telephone number;
- MijnDSI account details;
- Secure copy of proof of identification (without BSN and photo) and document number;
- Data pertaining to education and exams pertinent to the certification;
- Data pertaining to your past 5 years of employment history;
- Data pertaining to the VOG or equivalent foreign document;
- Data regarding a case before the DSI Enforcement Committee or the DSI Appeals Committee;

# Certification

- Data pertaining to measures imposed by the DSI Enforcement Committee or the DSI Appeals Committee;
- Data pertaining to any previous DSI certification;
- Data from the bankruptcy register;
- Data pertaining to your own statement.

## 4.3 Grounds for processing

When you request a DSI certification, you enter into an agreement with us. In order to implement this agreement, we must be able to process the personal data listed above. That means the grounds for processing your personal data is: the implementation of an agreement.

If we share personal data with the Participant, it is only because sharing is necessary in order to protect the Participant's justified interests. 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. The Participant can use this information to monitor and prove the integrity and competency of its employees.

To the extent that we process criminal law data pertaining to you, we will only do so to comply with your certification request. This exception to the prohibition of processing criminal law data can be found in Article 33, section 2 sub a of the General Data Protection Regulation Implementation Act (hereafter: GDPR Implementation Act).

## 4.4 Access to and sharing personal data

Your personal data may only be accessed by those DSI employees whose work requires them to have access to your personal data. These include the employees of the certification department and their supervisors.

You also have access to your own personal data via the MijnDSI environment. In order to verify specific elements of the certification process, we may share the strictly necessary personal data, such as the applicant's first and last name, with educational institutions and current or former employers. We will only provide these data with your authorisation.

If you are a certified individual, then you will be added to the DSI public register. Anyone may search through the register by name. The person who searched for you can then view your personal data: your name, title, 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.

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.



# Certification

## 4.5 Storage period

We will store your personal data for as long as you are certified and listed in one of our public registers.

If you ask us to terminate your certification, we will immediately delete your personal data from the public register.

The personal data and documents you provided will be deleted from the DSI administration after three years.

However, we will store your name, address, place of residence, date of birth, e-mail address and certification history for a period of five years after termination of your certification. This storage period is required by the DSI Code of Conduct. The DSI Code of Conduct stipulates regulations pertaining to

integrity and competency. If you fail to comply with these regulations, you may be subject to 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.

If we have not granted DSI certification because you did not provide all of the necessary data, then we will store the personal data and documents provided by you for a period of one year.

# Ethics Enforcement

Article 7 of the DSI General Regulations require DSI certified individuals to comply with the provisions of the Code of Conduct. Failure to comply with the Code of Conduct may result in disciplinary proceedings.

The DSI Enforcement Committee may impose disciplinary measures such as a reprimand, suspension, fine or expulsion (Article 12.11 General Regulations). Article 10 of the General Regulations also empowers DSI to impose fines on certified individuals by means of a transaction.

The regulations that apply to disciplinary investigations and procedures are described in the DSI General Regulations, the DSI Enforcement Committee Regulations and the DSI Appeals Committee Regulations.

## 5.1 Purposes

We process personal data for the following purposes:

- to maintain an independent Enforcement Committee and Appeals Committee to process complaints regarding a certified individual.
- the application and implementation of ethics enforcement law as described in the DSI General Regulations, the DSI Enforcement Committee Regulations and the DSI Appeals Committee Regulations.

## 5.2 Which personal data do DSI process for ethics enforcement?

We process several categories of personal data for the purpose of ethics enforcement. These categories are described below.

If you as a certified individual are involved in a disciplinary investigation, we will process the following personal data:

- First name, last name, date of birth, gender;
- Address and place of residence;
- E-mail address;
- Telephone number;
- Data pertaining to the certification (ex.: period and type of certification);
- Data pertaining to the (handling of) the report/complaint;
- Data pertaining to the investigation;
- Data pertaining to the certified individual's defence;
- Data pertaining to the evidence;
- Data pertaining to the verdict and measure imposed.

If you are the person who submitted the report about a certified individual's actions, then we will process the following personal data:

- First name, last name;
- Address and place of residence;

# Ethics Enforcement

- E-mail address;
- Telephone number;
- Data pertaining to the (handling of) the report/complaint;
- Data pertaining to the evidence;

We will process the following personal data pertaining to the members of the Enforcement Committee and the Appeals Committee and the secretaries of these committees;

- Initials, first name, last name;
- Titles;
- Business address and town/city;
- (Business) E-mail address;
- Professional data;
- Data pertaining to other posts;

## 5.3 Grounds for processing

If you are a DSI certified individual, then you have entered into an agreement with us. When entering into this agreement, you declared that you will comply with the DSI Code of Conduct and the procedures and verdicts of the Enforcement Committee and Appeals Committee.

In order to implement this agreement, we must be able to process your personal data if a report is submitted regarding a possible violation of the DSI Code of Conduct. That means the grounds for processing your personal data for DSI ethics enforcement is: the implementation of an agreement

## 5.4 Access to and sharing personal data

Your personal data may only be accessed by those DSI employees whose work requires them to have access to your personal data. These include the employees of the enforcement department and their supervisors.

The members of the Enforcement Committee and the Appeals Committee and the secretaries of these committees also have access to the personal data relevant to a disciplinary procedure;

DSI will notify the Participant in writing of any decisions made by the Enforcement Committee regarding a measure to be imposed.

When the Enforcement Committee imposes a disciplinary measure, DSI will make a note in the Register for a period of three years. The note will describe the measure imposed and the reason for the measure. Any person consulting the register will have access to this information.

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.

## 5.3 Storage period

Your case file will be stored for three years after the completion of the disciplinary procedure, after which we will delete the personal data pertaining to the disciplinary procedure.

# Training courses

If you wish to be eligible for DSI certification, then you must complete or pass certain training courses and/or exams. The training and examination requirements are listed in Appendix 1 of the General Regulations, and differ per certification type. To retain their certification status, the certified individual must also participate in continuing

These training courses, exams and continuing education programmes are offered by DSI-accredited educational institutions. For a list of these educational institutions, see the DSI website: [www.dsi.nl](http://www.dsi.nl)

In supplement to the curricula offered by these educational institutions, DSI also offers its own training programmes, exams and continuing education programmes.

Completing the DSI programmes ensures that you meet the certification requirements. You can also enrol in a DSI training programme without the goal of certification.

## 5.1 Purposes

We process your personal data to inform and advise you about our training programmes and to honour your requests for information.

When you register for a training programme, we will process your personal data for the registration and administrative processing of your participation and to teach the training programme.

We may use your personal data to analyse how we can improve our services.

## 5.2 Which personal data do DSI process for training programmes?

When you register for a DSI training programme, we will process the following personal data:

- First name, last name, date of birth, gender, and nationality;
- Address and place of residence;
- E-mail address;
- Telephone number;
- Data pertaining to the training programme you have registered for, including payment details;
- MijnDSI account details;
- Personal data pertaining to your training programme, such as your registration date, exam date and exam result;
- Data pertaining to potential DSI certification;
- Your feedback on the training programme, and any other information you offer;
- Objections and appeals regarding exams.



# Training courses

## 5.3 Grounds for processing

When you register for a DSI training programme, you enter into an agreement with us. In order to implement this agreement, we must be able to process the personal data listed above. That means the grounds for processing your personal data is: the implementation of an agreement.

## 5.4 Access to and sharing personal data

Your personal data may only be accessed by those DSI employees whose work requires them to have access to your personal data. These include the employees of the training department and their supervisors.

You also have access to your own personal data via the MijnDSI environment.

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.

## 5.3 Storage period

If you have attended one of our training programmes, we will store your personal data for a period of five years after you completed the training.



# Approval and amendment

This 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 14th of February 2023.

A circular inset image of a smiling woman with blonde, wavy hair, wearing a blue and white striped shirt.

Do you have questions  
about this document,  
we are happy to help you.  
Contact us  
with [info@dsi.nl](mailto:info@dsi.nl)

This is where trust starts

[www.dsi.nl](http://www.dsi.nl)  
020 620 12 74  
[info@dsi.nl](mailto:info@dsi.nl)

