



First Name

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Training Center Privacy Policy

This Privacy Policy explains why SSI Training Centers obtain your personal data for the purposes of conducting your training, issuing certifications, administration of your private information and any other necessary specifics regarding the performance of this agreement.

We (SSI) review this Privacy Policy periodically for compliance with changes to the GDPR (General Data Protection Regulation) and other relevant regulations. When necessary, we will update the Policy to comply with new requirements.

SSI and SSI Training Centers jointly determine the purpose, scope and delivery of training content, processing, issuing and delivering certifications and administration of your personal data stored in the MySSI system at SSI International GmbH, Johann-Hoellfritsch-Straße 6, 90530 Wendelstein, Germany, Email: info@diveSSI.com, Tel:+49-9129-9099380.

If you have questions or you would like a copy of the Joint Controller Agreement that describes the above arrangement and the safeguards for protecting your personal data, go to the following link: https://my.divessi.com/ssi_dc_joint_controller_agreement, or contact SSI at privacy@diveSSI.com. This privacy statement applies only to the SSI Training Center. Sections 1 to 8 and 10 to 11 of this privacy statement including its Appendix ("General Provisions") explain in general how we collect and use your personal data when you use our services or the services from an SSI Training Center. The addendum contained in Section 9 ("Californian Provisions") contains additional provisions in compliance with the California Consumer Privacy Act ("CCPA") that only apply to Californian residents. The Californian Provisions supplement the General Provisions but in the event of any conflict between the General Provisions and the Californian Provisions, the Californian Provisions shall prevail but only with regard to Californian residents. A separate data protection statement applies for the use of the MySSI section at my.diveSSI.com.

1. SSI Authorized Training Center "Data Controller"

SSI Training Center Name _____

Street, PO Box _____

ZIP Code, City _____

State, Country _____

2. Personal Data

"Personal data" is any information relating to an individual person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, by reference to information such as a name, identification number, location data, or online identification. Name(s), address(es), telephone number(s), e-mail address(es), user ID(s), credit card number(s), social media account ID(s), login username(s), IP address(es) and GPS data are considered personal data.

3. Processing Your Personal Data

SSI International GmbH, SSI Training Centers, your SSI Instructor and other SSI Professionals may all be involved in your training, processing, and delivery of your certification, therefore we need to collect and process the following personal data:

- First and Last Name
- Address, Post Box
- Postcode, City
- State and Country
- Email Address
- Telephone Numbers (optional)
- Date of Birth
- Gender
- Photo
- Language
- SSI Master ID
- Course Type, Course Progress
- Certification Data (Number, Date, Instructor, Instructor Number, Number of Certification Dives, Certification Year)
- Training Center Affiliation
- MySSI App Geo Locations
- Medical Information
- Insurance Data (when applicable)
- SSI Professional Number (only for SSI Professionals)
- QMS Data (for Professionals)

Note: The personal data we collect is for the sole purpose of delivering training content, processing, issuing and delivering certifications, and administration of your personal data stored in the MySSI system.

With your registration in the MySSI system, you will be able to access everything SSI – Digital Training Materials, MySSI Logbook, Certification Cards and more at the SSI website www.divessi.com or on the MySSI mobile app. Additionally, SSI International GmbH (SSI), your SSI Training Center, SSI Instructors and SSI Professionals will have access to your personal data for training and certification purposes.

For more information you may go to the SSI Privacy Policy at https://my.divessi.com/myssi_privacy. Here you will learn more about data processing, MySSI, the associated services provided by SSI and how your certification card is automatically processed upon your completion of training.



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When you initially register at MySSI you will receive an email from SSI with your Username and Password. Additionally, you will be provided a link to the SSI Privacy Policy describing how your personal data will be used. Activation of your MySSI account is mandatory to access your personal profile, training progress, certifications, education level and much more.

Upon completion of all academic, pool and open water training, SSI will process your digital certification card information – Your Name, Photo, Customer Number (Master ID), SSI Training Center, Certifying Instructor, Year You Started Diving, Level of Experience, Number of Dives, and Issue Date. All this information is accessible through our MySSI account.

The described processing is necessary for the performance of a contract (Article 6 (1) (b) General Data Protection Regulation).

By registering in MySSI, you are consenting to share your personal data: Name (First and Last), Address (Postbox), Postcode (Zip), City, State, Country, Email Address, Telephone Numbers (optional), Date of Birth, Photo, Language, Gender, SSI Master ID, Course Type, Course Progress and Certification Information (Name, SSI Training Center, Certifying Instructor, Year You Started Diving, Level of Experience, Number of Dives and Issue Date), plus your Training Center Affiliation. Additionally, all personal information voluntarily provided by you and stored in MySSI, e.g. – Specific diving insurance policies (when applicable) or Medical Participant Questionnaires for processing student and professional certifications through other SSI Service Centers. You may choose to affiliate or do business with any SSI Service Center or SSI Training Center around the world. For a complete list of all Service Centers and Training Centers log on to <https://my.divessi.com/ssi> or <https://my.divessi.com/divecenter>.

By giving your consent, SSI Training Centers may subsequently access your personal data described above in order to identify you, verify or confirm the status of your training and certifications and to offer you continued training and services based on your diving experience. For more information on the relevant data processing and data sharing accessed in the MySSI system, go to MySSI Privacy Policy https://my.divessi.com/myssi_privacy.

Legal basis for the described processing is consent (Article 6 (1) (a) General Data Protection Regulation).

4. Special rules for youth under the age of 16

Youth under the age of 16 cannot participate in any SSI training without the explicit consent of their parent or legally appointed guardian. Personal data for youth under the age of 16 is only used for conducting training and issuing certifications as described above.

Youth under the age of 16 who visit www.diveSSI.com cannot register or use the MySSI system without consent from their parent or legal guardian. SSI strongly recommends that the parent or legal guardian closely monitor their youth's internet activities until they are of legal age.

5. Transferring your personal data to third parties

In the event of a diving incident or a complaint against an SSI Professional, your SSI Training Center may transfer your personal data to SSI (SSI International GmbH, Johann-Hoellfritsch-Straße 6, 90530 Wendelstein, Germany) by email to info@diveSSI.com. As required by law, it may also be necessary to forward this same information to other SSI Service Centers or third parties involved in a case or in the performance of this agreement, e.g. – insurance companies, public authorities or other companies affiliated with SSI. This is only as necessary for fulfilling the training requirement, complying with legal obligations and ensuring our legitimate interests.

Your SSI Training Center will also transfer your personal data to SSI while storing and processing your personal data. If necessary, this includes the student or professional candidate Medical Participant Questionnaire for the administration and processing of your training and certifications managed by SSI in the MySSI System – my.diveSSI.com.

The purpose of processing and storing your personal data is necessary for the legitimate interests pursued by SSI (Article 6 (1) (f) General Data Protection Regulation).

We may also transfer your personal data to the following service providers in order to complete your training:

- IT service providers and/or providers of data hosting services;
- Service providers of software solutions who also support SSI in providing services including marketing tools, marketing agencies, communication service providers and call centers;
- Third parties that provide service to you, e.g. - parcel services for the shipment of your credentials, payment service providers and banks for processing payment;
- Other necessary third parties, e.g. - auditors, insurance companies, legal representatives, etc.;
- Officials and other public entities as required by law, e.g. - tax authorities, etc.; and,
- Industry partners within the dive industry for the purpose of personalized advertising of diver training, products and services with the user's consent. This includes, for example, advertising for diving insurance, membership for divers, promotion of local training programs and events conducted by Training Centers, etc.

The processing is necessary for the purposes of the legitimate interests pursued by us (Article 6 (1) (f) General Data Protection Regulation).

SSI will transfer your personal data to external service providers only when third parties are processing the data on our behalf. We will enter into a data processing agreement to ensure that both the security of your data and our information is only used in accordance with our Privacy Policy.



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6. Transferring your personal data to third parties outside of the US/EU/EEA

We transmit your personal information to companies and contractual partners outside of the EU/EEA for the verification of your SSI education and certification, provision of our services, operation of the website, processing of your order, the maintenance of our IT systems and software, etc. However, such a transfer does not alter our obligation to protect your personal data under this data protection statement.

If your personal information is transmitted outside of the EU/EEA, we will provide adequate security by transferring to countries that have an appropriate level of protection, as confirmed by the EU Commission, or by concluding an appropriately formulated contract between us and the legal person outside of the EU/EEA who receives the data. In other cases, the data transfer might be based on art. 49 para. 1 GDPR. You may receive a copy of the suitable guarantees by sending an e-mail to privacy@divessi.com.

7. Data Security

SSI takes an appreciable amount of technical and organizational security to protect your personal data from unintentional or unauthorized modification, deletion, loss, theft, viewing, forwarding, reproduction, use, alteration or access. SSI and our staff comply with confidentiality and data privacy regulations. Likewise, all authorized agents who have access to your personal data to fulfill their professional duties are also subject to the same obligations of confidentiality and data privacy.

8. Data Retention

SSI will retain your personal data to the extent permitted in the Privacy Policy. After the end of that relationship, SSI will only retain your records to perform the purposes set out in this agreement. Additionally, SSI and local law may require your SSI Training Center to retain your training records for an extended period of time. While in other cases, SSI may only need to retain your personal data for as long as it takes for administration purposes and to protect itself from any legal claims. For more information about SSI data retention policies, go to; https://my.divessi.com/myssi_privacy.

In the case of a registered user that does not activate the MySSI account and does not get certified within 12 months after registration, the user data and account will automatically be user disabled from the MySSI system. For more information about the MySSI data retention policies, go to MySSI Privacy Policy at https://my.divessi.com/myssi_privacy.

9. Californian Provisions

9.1. Categories of personal information we collect, where we collect it from, why we collect it, and who we share it with.

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or household ("personal information").

We use the personal information we collect for our operational purposes or other purposes set out in this privacy notice. Those purposes may include

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Short-term, transient use, provided the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.
- Undertaking activities to verify, improve, upgrade, enhance, or maintain the quality or safety of our products or services.

To help you understand our privacy practices, the following table shows, for the past twelve (12) months: which categories of personal information we have collected, the categories of sources from which we collected personal information, our business or commercial purposes for collecting the information, and the categories of third parties with whom we have shared personal information:



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Category of Personal Information	Sources	Purposes	Third parties shared with
<ul style="list-style-type: none"> Identifiers such as name, email, address, PTR number, and PPR number 	<ul style="list-style-type: none"> Consumer Third-party operators of tournaments or other events. Third-party organizations for amateur and professional athletes. 	<ul style="list-style-type: none"> To provide product offerings or services at events we sponsor. To accept and fulfil product purchases. To provide you with newsletters or other mailings. To perform our contractual obligations to you. To perform market research and product development. To market our products and services to you. 	<ul style="list-style-type: none"> Service providers Affiliates Third parties we rely on for business, financial, or legal matters, such as financial institutions, collection agencies, insurance companies, creditor protection associations, and legal counsel Third parties that help us market or advertise our products and services
<ul style="list-style-type: none"> Categories of personal information described in Cal. Civ. Code § 1798.80(e) such as name, email, address, credit card number or other payment information, and telephone number 	<ul style="list-style-type: none"> Consumer Third-party operators of tournaments or other events. Third-party organizations for amateur and professional athletes. 	<ul style="list-style-type: none"> To provide product offerings or services at events we sponsor. To accept and fulfil product purchases. To provide you with newsletters or other mailings. To perform our contractual obligations to you. To perform market research and product development. To market our products and services to you. 	<ul style="list-style-type: none"> Service providers Affiliates Third parties we rely on for business, financial, or legal matters, such as financial institutions, collection agencies, insurance companies, creditor protection associations, and legal counsel
<ul style="list-style-type: none"> Characteristics of protected classifications under California or federal law such as age and gender. 	<ul style="list-style-type: none"> Consumer 	<ul style="list-style-type: none"> To provide product offerings or services at events we sponsor. To provide you with newsletters or other mailings. To perform market research and product development. To market our products and services to you. 	<ul style="list-style-type: none"> Service providers Affiliates Third parties we rely on for business, financial, or legal matters, such as financial institutions, collection agencies, insurance companies, creditor protection associations, and legal counsel
<ul style="list-style-type: none"> Commercial information such as, e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies 			
<ul style="list-style-type: none"> Internet or other electronic network activity information such as e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement 			



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9.2. Disclosure of personal information

In the past twelve (12) months, we have disclosed the following categories of personal information of California consumers for a business purpose:

- Identifiers
- Categories of personal information described in Cal. Civ. Code § 1798.80(e)
- Characteristics of protected classifications under California or federal law

9.3. Do Not Track

Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. Instead, we collect, use, and share information as described in this privacy notice regardless of a “do not track” choice.

9.4. Your rights under California law

You have the right to ask us to send you the following information:

- The personal information we have collected, used, or disclosed about you.
- The categories of sources from which we collected the personal information.
- The categories of third parties with whom we share personal information.
- The categories of personal information we have collected about you.
- Our business or commercial purpose for collecting personal information.
- The specific pieces of person information we have collected about you.

You have the right to ask us to delete the personal information about you that we have collected or that we maintain.

We do not, and will not, sell your personal information. Therefore we don't provide a mechanism to opt-out of sales of personal information.

9.5. Non-discrimination

Your privacy rights are important. If you exercise your privacy rights under California law, we will not do any of the following in response:

- Deny you goods or services.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- Charge you different prices or rates for goods or services, including through the use of discounts or other benefits, or imposing penalties.

9.6. How California residents can submit requests

If you are a California resident and you want to submit a request to us regarding your California rights, you can contact us here privacy@divessi.com. If you have a pre-existing account with us, you must submit your request through that account, but you do not have to create an account with us to submit a request.

If you submit a request to delete personal information, you must separately confirm the request. After receiving your request, we will send you a separate communication with instructions on how to confirm your request to delete.

We can only respond to your request if it is verifiable. This means we are obligated to take reasonable steps to verify your identity.

If you have a password-protected account with us, we will verify your identity using our existing authentication practices for that account, but you must re-authenticate yourself before we can disclose or delete the information related to your request.

If you do not have an account with us, we verify your identity by matching the following information you provide as part of your request with information about you we already have: name, address, phone number.

If necessary to verify your identity, we may ask you to provide additional information that will help us do so. We may also require a signed declaration under penalty of perjury, depending on the nature of the request. We will only use that additional information in the verification process, and not for any other purpose. If we cannot verify your request, we will not disclose any personal information.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

9.7. Authorized agents

If you wish to submit a request to know or delete through an authorized agent, we require the following before we can process the request:

- A notarized copy of your written permission authorizing the agent to make the request, and
- That you verify your identity directly with us, as described above.

Consumers may submit the information listed above to privacy@divessi.com. Authorized agents may also submit the notarized copy of written permission to privacy@divessi.com.

If your authorized agent has a valid power of attorney under California Probate Code sections 4000 to 4465, we may request proof of the power of attorney instead of the foregoing.

We may deny a request from an agent that does not submit proof you authorized them to act on our behalf.



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9.8. Changes to this privacy notice

From time to time, we may update this privacy notice. When we do, we will post it on our Website and include the effective date of the update. If there are material changes to this privacy notice, we will post a prominent notice on our Website and provide other notice as required by law.

10. Your Rights

Your rights regarding SSI processing and storage of your personal data:

- You have the right to access and receive a copy of your personal data at SSI, Art. 15 General Data Protection Regulation (GDPR).
- You have the right to receive a copy of your personal data in a commonly used and legible format.
- You have the right to not be the subject of a decision based solely on an automated process, including profiling, which may result in legal consequences or any similar affect concerning you, Art. 22 GDPR.
- If your personal data is incorrect or no longer current, you have the right to modify the information, Art. 16 GDPR.
- You also have the right to know that we may transmit your data to another controller Art. 20 GDPR.
- You have the right to obtain verification your personal data has been deleted from MySSI, ("right to be forgotten"), Art. 17 GDPR.
- You have the right to obtain a copy of any restriction of processing where the prerequisites have been met, Art. 18 GDPR.

11. Your right to object

Where your personal data is concerned for the use of direct marketing, you have the right to object to that use.

Additionally, if we process your data even for legitimate reasons, you also have the right to object at any time if grounds develop out of your specific situation.

So that SSI may process your inquiry regarding the rights listed above and ensure your personal data is not given to any unauthorized third parties, please email SSI a short description and clear direction regarding your request to object and or modify your personal data stored at SSI. You also have the right to file a complaint with the data protection authority.

In particular, the data protection authority in the country or state of your residence or place of work, if you believe that processing your personal data violated applicable data protection laws, Art. 77 GDPR.

The German version of this data protection declaration is legally binding - subject to change.

Last update: 2021-07-01

Participant's Name (Print)

Participant's Signature

Date (DD/MM/YY)

Print Name of Parent/Guardian (When Applicable)

Signature of Parent/Guardian (When Applicable)

Date (DD/MM/YY)