



## **Terms of Reference and Privacy Notice for EU-TWIX users**

### **1. Authorised users**

The EU-TWIX system is only accessible to officials of European law enforcement authorities (e.g. customs, police and other governmental agencies such as environmental inspection services, national crime units, etc. involved in wildlife trade controls) and CITES Management Authorities as well as selected international organisations. The responsibility of designating authorised officials generally lies with the EU-TWIX Focal Points of relevant agencies. Entitled officials wishing to join EU-TWIX can also contact the Project Manager or the Support Manager directly, either via email or the contact section on the EU-TWIX website (<https://www.eu-twix.org/contact>).

There is currently no restriction on the number of officials who can get access to the system, however, they are restricted to officials who are directly involved in wildlife trade controls.

### **2. Username and password**

Authorised officials receive an invitation email to activate their access to the EU-TWIX website. This email is sent only to users' nominal professional email addresses, which will be used as the username. Access to the website via group emails is not allowed.

Each user chooses his/her own password, which should contain at least 8 characters and at least one capital letter and one digit.

Passwords should not be disclosed or shared with any other person.

The use of usernames and passwords is not required to connect to the EU-TWIX mailing list, as information is shared directly via users' professional email addresses.

### **3. Types of personal data stored in EU-TWIX and their use.**

Personal data are stored on the website and TRAFFIC's IT infrastructure to maintain and manage all components of the EU-TWIX system.

### *The EU-TWIX mailing list*

Full names and email addresses of EU-TWIX users are stored on a list server hosted by the USA-based company Net Atlantic (<https://www.netatlantic.com/>). This list server is used to distribute messages amongst officials connected to the EU-TWIX mailing list.

No sensitive data, such as offenders' names or their passport details, should be shared on the EU-TWIX mailing list.

The lists of EU-TWIX users and EU-TWIX Focal Points are maintained by the two staff managing EU-TWIX so that they can be shared with users on a regular basis. The list of EU-TWIX users contains full names and email addresses. The list of EU-TWIX Focal Points consists of full officials' names, email addresses, job titles and work contact details (agency name, postal address, phone and fax, where applicable). This information is received either through the EU-TWIX Focal Points or from the users themselves, and is required in order to be able to identify the eligibility of users to access the system. Contact details are also stored in an internal list to enable EU-TWIX staff to contact users when needed.

### *The EU-TWIX website*

The lists of EU-TWIX users and EU-TWIX Focal Points described above are stored on the EU-TWIX website to support wildlife law enforcement and management officials' daily work.

The following lists, which contain personal data, are also available to EU-TWIX users via the EU-TWIX website:

- Directory of experts in fauna and flora
- Directory of rescue centres for seized specimens
- Directory of European laboratories
- Emergency contact details for main European airports

Messages exchanged via the EU-TWIX mailing list are stored in the 'Archives of the mailing list' section available to EU-TWIX users. Any emails containing sensitive personal data such as offenders' names, photos and passport details will be removed by EU-TWIX staff as soon as this has come to their attention, should this type of information have been sent by users by mistake.

EU-TWIX users can upload documents for the benefit of other EU-TWIX users in the 'Shared documents' section. These documents might contain personal data in order to support wildlife law enforcement actions. Should a document contain any problematic content, it will be removed by EU-TWIX staff as soon as this has come to their attention.

The full names of the owners of the copyrights for photos used on the EU-TWIX website are made available to the public via the homepage (<https://www.eu-twix.org/copyright>).

#### **4. Maintenance and management of EU-TWIX**

The EU-TWIX system is maintained and managed by EU-TWIX staff employed by TRAFFIC on behalf of the CITES law enforcement and management authorities of the participating countries.

EU-TWIX staff commit to never use individuals' personal details in any way that would not reasonably be expected.

TRAFFIC is registered with the Information Commissioner's Office (ICO) in the UK as a processor of personal information (Registration No. Z757165X).

EU-TWIX staff are based in Brussels, Belgium, and Cambridge, UK, and have a legitimate interest in processing the data held.

Management and maintenance of the EU-TWIX system include, among others:

- Keeping the lists of EU-TWIX users and EU-TWIX Focal Points up to date (adding users to, and removing them from the lists and servers, updating personal data),
- Transfer of seizure information to the EU-TWIX database on behalf of Member States (see Point 5),
- Regular update of various sections of the EU-TWIX website (e.g. the directories, the lists of EU-TWIX users and EU-TWIX Focal Points, and the 'Resources' section which contains identification guides and training materials, amongst others). While updating the directories, personal data held in them might need to be shared among the institutions listed in the said directories, so that they can check that their own contact details are up to date and see which other institutions are also listed.

Data are retained for as long as is necessary. EU-TWIX staff will delete personal information as soon as there is no longer any legitimate reason to retain it.

Each EU-TWIX user, or institution listed in the Directories, has the right to request the information stored in the EU-TWIX system that relates to him/her/it and can request that it be removed or corrected at any time. For this, EU-TWIX staff should be contacted directly ([contact@eu-twix.org](mailto:contact@eu-twix.org)) or via their EU-TWIX Focal Point. Requests will be processed in a timely manner.

#### **5. Entry of seizure data into the database**

Seizure data are provided electronically to the EU-TWIX staff for entry into the database. A reporting template is available to users in the 'Resources' section of the website. For more details on the EU-TWIX format requirements, please contact EU-TWIX staff ([contact@eu-twix.org](mailto:contact@eu-twix.org)).

Based on the agreement with several non-EU partner countries, seizure data reported by selected customs agencies to the World Customs Organization are also included in the EU-TWIX database.

## **6. Use of EU-TWIX information (ownership and confidentiality)**

The information contained in the EU-TWIX system is to be used for enforcement purposes only by officials who have access to the tool.

### **IMPORTANT:**

**The ownership of the seizure data and/or any information exchanged on the mailing list remains with the authority that reported/shared the said data/information to EU-TWIX.**

**The sharing of any information sourced from EU-TWIX is not allowed without prior agreement of the agencies who shared the information in the first place.**

**Any user not respecting this confidentiality and ownership rule will be excluded from the EU-TWIX network.**

## **7. Complaints**

EU-TWIX staff are committed to protecting your personal information. If, however, you have a concern about how we have handled your data or about the contents of this Privacy Statement, or if you feel we may have mishandled your personal information, please contact us. We will respond efficiently to any complaint that we receive. Our contact details are as follows: [contact@eu-twix.org](mailto:contact@eu-twix.org).

If you are not satisfied with our response, or if for any other reason you want to speak directly with the regulator, you can contact the Information Commissioner's Office with your concerns: <https://ico.org.uk/concerns/>.

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