

## **Eastern Africa-TWIX Terms of References and Privacy Notice**

### **1. Authorized users**

The Eastern Africa-TWIX system is only accessible to officials of wildlife law enforcement authorities (e.g. Customs, Police and other governmental agencies such as wildlife services, national crime units, public prosecutions, judiciary etc. involved in wildlife trade controls) and CITES Management Authorities of Eastern Africa. The responsibility of designating authorized officials generally lies with the Eastern Africa-TWIX Focal Points of relevant agencies.

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 issues.

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

Authorized officials receive an invitation email to activate their access to the Eastern Africa-TWIX website.

This email is sent only to users' nominal email addresses used for work purposes 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 nor shared with any other person.

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

#### **The Eastern Africa-TWIX mailing list**

Full names and email addresses of Eastern Africa-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 Eastern Africa-TWIX mailing list.

No sensitive data, such as offenders' names or their passport details, address or car plates number should be shared on the Eastern Africa-TWIX mailing list.

The lists of Eastern Africa-TWIX users and Eastern Africa-TWIX Focal Points are maintained by the Eastern Africa-TWIX project manager so that they can be shared with users on a regular basis. The list of Eastern Africa-TWIX users contains full names and email addresses. The list of Eastern Africa-TWIX Focal Points consists of full officials' names, email addresses, job titles. This information is received through the Eastern Africa-TWIX Focal Points 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 Eastern Africa-TWIX staff to contact users, when needed.

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

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

### **The Eastern Africa-TWIX website**

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

Eastern Africa-TWIX users have the possibility to upload documents for the benefit of other Eastern Africa-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 Eastern Africa-TWIX staff as soon as this has come to their attention.

### **4. Maintenance and management of Eastern Africa-TWIX**

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

Eastern Africa-TWIX project manager is based in Tanzania and have legitimate interest for processing the data held.

- Management and maintenance of the Eastern Africa-TWIX system include, among others:
- Keeping the lists of Eastern Africa-TWIX users and Eastern Africa-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 Eastern Africa-TWIX database on behalf of participating countries,
- Regular update of various sections of the Eastern Africa-TWIX website as required

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

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

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

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

#### **6. Use of the seizure data and information shared on the mailing list and ownership**

The information contained in the Eastern Africa-TWIX database or shared via the Eastern Africa-TWIX mailing list is to be used for enforcement purposes by officials who have access to the tool.

#### **IMPORTANT:**

**The distribution of any information shared on the mailing list and/or the publication of raw data or the outcome of any analysis of the seizure data contained in Eastern Africa-TWIX database are not allowed without prior agreement of the agency concerned. Information shared on the mailing list and/or data stored in the database remain the property of the agency that provided it/them in the first place. Any user not respecting this confidentiality and ownership rule will be excluded from the Eastern Africa-TWIX network.**

#### **7. Complaints**

Eastern Africa-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@eastern-africa-twix.org](mailto:contact@eastern-africa-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/>.