



## **Terms of References and Privacy Notice for the use of West Africa-TWIX system**

### **1. Authorized users**

The West Africa-TWIX system is only accessible to officials of wildlife law enforcement agencies (e.g. Customs, Police and other government agencies such as wildlife services, national crime units, etc. involved in wildlife trade controls) and CITES Management Authorities of ECOWAS Member States. The responsibility of designating authorized users/officials generally lies with the West Africa-TWIX Focal Points of relevant agencies. There is currently no restriction on the number of users/officials who can get access to the system, however the system is restricted to officials who are directly involved in wildlife trade control issues.

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

Authorized officials receive an invitation email to activate their access to the West Africa-TWIX website. This email is sent only to users' nominal email addresses used for work purposes, which will also 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 West Africa-TWIX mailing list, as information is directly shared via users' professional email addresses.

### **3. Types of personal data stored in West 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 West Africa-TWIX system.

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

Full names and email addresses of West Africa-TWIX users are stored on a list server hosted by the USA-based company '[Net Atlantic](#)'. This list server is used to distribute messages amongst officials connected to the West 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 West Africa-TWIX mailing list.

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

### **The West Africa-TWIX website**

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

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

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

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

West Africa-TWIX project manager is based in Ghana and has legitimate interest for processing the data held.

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

- Keeping the lists of West Africa-TWIX users and West 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 West Africa-TWIX database on behalf of Member States,
- Regular update of various sections of the West Africa-TWIX website as required

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

Each West Africa-TWIX user has the right to request the information stored in the West Africa-TWIX system that relates to him/her/it and can request for it to be removed or corrected at any time. For this, West Africa-TWIX staff should be contacted directly ([contact@westafrica-twix.org](mailto:contact@westafrica-twix.org)) or via their West 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 West Africa-TWIX format requirements, please contact West Africa-TWIX staff ([contact@westafrica-twix.org](mailto:contact@westafrica-twix.org))

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

The information contained in the West Africa-TWIX database or shared via the West 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 West 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.**

## **7. Complaints**

West 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@westafrica-twix.org](mailto:contact@westafrica-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/>.