

TRAFFIK ANALYSIS HUB – DATA PRIVACY NOTICE

1. INTRODUCTION

- 1.1 The data about human trafficking that is shared through the Traffik Analysis Hub is principally *aggregated* and/or *anonymised* data, which does not identify or allow the identification of particular individuals. However, the TA Hub does also contain some limited *personal* data, relating to individuals who are either directly identified or are identifiable from information available elsewhere (usually on the Internet).
- 1.2 This privacy notice provides information about our processing of personal data within the TA Hub, and some related matters. We are publishing this privacy notice for the information and benefit of the individuals to whom personal data within the TA Hub may relate (referred to below as *you* and *your*) – usually, these individuals will be actual or alleged perpetrators, victims, witnesses, investigators, or prosecutors of human trafficking.
- 1.3 This privacy notice does not deal with our processing of *other* personal data - for example, contact details of individuals representing organisations that participate as partners in the TA Hub, or personal data relating to our own employees or applicants for employment.
- 1.4 Specifically, this privacy notice:
 - 1.4.1 provides a brief summary of our processing of personal data within the TA Hub and then explains in more detail:
 - 1.4.2 who we are
 - 1.4.3 the sources from which we obtain your personal data
 - 1.4.4 the categories of personal data that we collect and process
 - 1.4.5 the purposes for which we process your personal data, and the legal basis of that processing
 - 1.4.6 the persons to whom we may disclose your personal data
 - 1.4.7 some information regarding international transfers of your personal data
 - 1.4.8 how long we may retain your personal data
 - 1.4.9 the rights that you can exercise in relation to your personal data under data protection law
 - 1.4.10 how to contact us if you have further questions or complaints, or to exercise your data protection rights

2. **SUMMARY PRIVACY NOTICE**

- 2.1 We collect and process personal data within the TA Hub in order to further the fight against human trafficking. The data is obtained (directly or indirectly) from public sources, usually on the Internet, and shared with organisations involved in the fight, including non-governmental organisations, law enforcement agencies, financial services companies and operators of other data hubs and repositories. These organisations, and the service providers who help us to operate the TA Hub, are located all over the world, including in countries which do not have data protection laws as strict as those in the UK. The data relates to perpetrators, victims or witnesses of human trafficking incidents or to individuals involved in the investigation or prosecution of human trafficking offences and, broadly speaking, to their involvement in human trafficking or its investigation or prosecution. We keep the data only as long as we need or are required by law to keep it.
- 2.2 The individuals to whom the data relates have legal rights which they can exercise to protect their personal data and privacy.

3. **WHO WE ARE**

- 3.1 The TA Hub is operated by TraffikAnalysis Hub Limited (referred to in this notice as **TA Hub, we** or **us**), an English company. For our contact details, see [How to Contact Us](#).
- 3.2 TA Hub is the "controller" of the processing of your personal data within the TA Hub for the purposes of UK data protection law.

4. **THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA**

We collect your personal data from two sources:

- 4.1 We collect most of the personal data in the TA Hub from publicly available websites on the Internet – we use automated tools to identify published reports of actual or alleged incidents of human trafficking and download information from those reports into the TA Hub.
- 4.2 Organisations participating as partners in the TA Hub contribute data regarding actual or alleged human trafficking incidents to the TA Hub. This is usually aggregated or anonymised personal data. Occasionally, however, it will include some personal data, which our partners will in turn have obtained from publicly available websites on the Internet or from other published sources.

5. **THE PERSONAL DATA THAT WE COLLECT AND PROCESS**

The personal data that we collect and process is contained in reports of actual or alleged incidents of human trafficking and may therefore, by its nature, fit into quite a wide variety of categories. It will include:

- 5.1 names, job titles, addresses and other identifiers

- 5.2 details of your actual or alleged involvement in human trafficking incidents, as perpetrator, victim, witness, investigator or prosecutor, or of your relationship to other involved individuals
 - 5.3 details of actual or alleged human trafficking incidents, to the extent that they relate to you as an individual (usually as actual or alleged perpetrator or victim), including, for example, details of the locations where particular incidents occurred or are alleged to have occurred (which may relate to you as a witness)
 - 5.4 details of your involvement in the investigation or prosecution of human trafficking incidents (if you are an investigator or prosecutor)
 - 5.5 other information about you as an actual or alleged perpetrator, victim or witness, or as an investigator or prosecutor, of human trafficking
6. **PURPOSES AND LEGAL BASIS OF PROCESSING**

We have set out in the table below the purposes for which we process your personal data. Under UK data protection law we can only process personal data if we have a specific legal basis to do so. Against each purpose in the table we set out our legal basis or legal bases for the processing.

Purpose of processing	Legal basis for processing
Generally, we process your personal data in order to make information on human trafficking available to non-governmental organisations, law enforcement agencies, financial services companies and others involved in the fight against human trafficking, with a view to disrupting and facilitating the detection and prosecution of human trafficking.	The processing is necessary so that we can pursue our legitimate interest in pursuing and furthering the fight against human trafficking. We only process your personal data for this purpose where this legitimate interest is not overridden by your interests or fundamental rights and freedoms.
We may also occasionally need to process your personal data in order to comply with our own specific legal obligations – for example, to disclose information required by law enforcement agencies in the course of a legal investigation.	Usually we carry out this processing because we need to in order to comply with our obligations under UK domestic law.
	We may occasionally be required to disclose personal data to law enforcement agencies or other organisations under the laws of other countries. In these cases, we disclose the data because we need to do so in order to pursue our legitimate interests in co-operating with competent law enforcement agencies and furthering the fight against human trafficking – we only disclose personal data in these

	circumstances where these legitimate interests are not overridden by your interests or fundamental rights and freedoms.
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7. PERSONAL DATA RECIPIENTS

We disclose the data within the TA Hub, including your personal data, to organisations participating as partners in the TA Hub. Most of our partners are non-governmental organisations involved in the fight against human trafficking, law enforcement agencies, and financial services and other private sector organisations with legal responsibilities to collect and analyse information in order to prevent or disrupt money laundering. We may also disclose to organisations operating similar hubs and data repositories.

We use a service provider (currently IBM Cloud Services) to host and process the data within the TA Hub, including your personal data. We may also disclose your personal data to other service providers engaged in the hosting or operation of the TA Hub. Our service providers are contracted on strict data privacy and security terms.

Finally, we may disclose your personal data to law enforcement agencies, courts or others involved in the criminal or civil justice system, where we are obliged by law to disclose.

8. INTERNATIONAL TRANSFERS

8.1 TA Hub is an English company, located in the United Kingdom and subject to UK data protection law. However you should be aware that some of the organisations participating as partners in the TA Hub or operating similar hubs and data repositories to whom we disclose personal data from the hub, our service providers, and law enforcement agencies and others seeking information from the TA Hub under applicable law, will be located in other countries, including countries which do not have data protection laws as strict as UK data protection law.

8.2 We disclose personal data to organisations in countries which do not have strict data protection laws because we need to do so in order to pursue the very strong public interest in fighting against human trafficking. However:

8.2.1 where we disclose your personal data to *service providers* in those other countries, receiving and processing your personal data on our behalf, we do so on data protection terms approved for the purposes of UK data protection law as ensuring appropriate protection for the transferred data

8.2.2 where we disclose your personal data to other organisations (such as organisations participating as partners in the TA Hub), we do where possible seek to put similar agreements in place, although this is not always feasible

9. PERSONAL DATA RETENTION

9.1 We have data retention policies in place, designed to ensure that we only hold your personal data for as long as we reasonable need to, given the purposes for which we

hold and process the data. Generally, we delete your personal data within five years after we first collect it (or receive it from one of our partners). We may by exception need to retain some personal data for longer than this, where we are required to do so by law, or otherwise because it is relevant to an on-going legal investigation or proceedings.

- 9.2 You should be aware, however, that our partners obtaining personal data from the TA Hub will have their own data protection and retention policies, which we do not control.

10. YOUR DATA PROTECTION RIGHTS

- 10.1 You have the following rights under UK data protection law, which you can exercise in relation to TA Hub's processing of your personal data:

10.1.1 a right of access to copies of your personal data and to certain related information, including (where available) a copy of any of the data transfer agreements put in place to protect your personal data

10.1.2 a right to object to our processing of your personal data, to request that your personal data is deleted and/or to request restriction of our processing your personal data (so that it is stored but not used other than to resolve outstanding disputes)

- 10.2 These rights are subject to exceptions and limitations – for example, if you object to our processing of your personal data, we may take the view that we need to continue where we have compelling legitimate grounds for doing so.

- 10.3 You can also lodge a complaint with the UK Information Commissioner's Office – see <https://ico.org.uk/make-a-complaint/>.

11. HOW TO CONTACT US

If you have any questions about our processing of your personal data, or wish to exercise any of your data protection rights, please contact us as follows:

Email: admin@traffikanalysis.org

Address: The Chief Executive, TraffikAnalysis Hub Limited, 1a Kennington Road, London, Greater London, SE1 7QP