



London, 13 August 2021

European External Action Service  
Access to Documents  
SG. AFFGEN.2 - Transparency PARC 6/560  
B-1046 Brussels Belgium

Dear Madam or Sir,

In accordance with Article 15(3) of the consolidated version of the Treaty on the Functioning of the European Union and Article 42 of the Charter of Fundamental Rights of the EU, implemented through Regulation (EC) No 1049/2001, Privacy International<sup>1</sup> and Tomaso Falchetta<sup>2</sup> would hereby like to jointly request a copy of the following documents that have been produced since EU started funding the UN Countering Terrorist Travel Programme<sup>3</sup> and are held by you:

**1. Any documents relating to the UN Countering Terrorist Travel Programme to which the European Union is one of the core funders.**<sup>4</sup>

These documents should among others include but not be limited to the following:

- a. Documents relating to any kind of financing provided to the UN Countering Terrorist Travel Programme or to specific countries in relation to the Programme by the EU.** It includes, but not be limited to, any payment to any public or private entity, both within or outside the EU, or other country authority for using the goTravel (United Nations-owned software solution)<sup>5</sup>,

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<sup>1</sup> Privacy International (PI) is a London-based non-profit, non-governmental organization (Charity Number: 1147471) that does research and advocates globally against government and corporate abuses of data and technology. It exposes harm and abuses, mobilises allies globally, campaigns with the public for solutions, and pressures companies and governments to change. PI challenges overreaching state and corporate surveillance so that people everywhere can have greater security and freedom through greater personal privacy. Within its range of activities, PI investigates how peoples' personal data is generated and exploited, and how it can be protected through legal and technological frameworks. It has advised and reported to international organisations like the Council of Europe, the European Parliament, the Organisation for Economic Cooperation and Development and the UN Refugee Agency. <https://privacyinternational.org/>

<sup>2</sup> This same request is also submitted by Tomaso Falchetta Global Policy Lead at Privacy International, in his private capacity as Italian national.

<sup>3</sup> <https://www.un.org/cttravel/>

<sup>4</sup> <https://www.un.org/cttravel/>

<sup>5</sup> <https://www.un.org/cttravel/goTravel/>

and/or any payment of salaries, reimbursement, benefits and travel expenses for any officials or employees of any public or private entity, both within or outside the EU, or of any country authority, who are involved in the UN Travel Programme in some way.

- b. Audits and evaluation documents conducted in the context of EU financing the UN Countering Terrorist Travel Programme and/other EU financing of the use of the UN goTravel software in specific countries.**
- c. Documents relating to any kind of official or unofficial training provided by the UN and/or EU member states and/or EU bodies to countries where the UN goTravel software is used.**
- d. Documents relating to any Human Rights Risks and Impact Assessments, including Data Protection Impact Assessments, conducted in the context of financing the UN Countering Terrorist Travel Programme and the use of the UN goTravel software in specific countries.** Please provide copies of all relevant documents containing an assessment or evaluation of the impact of the use of the goTravel software on human rights, including the protection of personal data, as well as the documents containing information about the risks posed by the further processing by the authority or authorities of countries where the UN goTravel software is operating and how these were mitigated.
- e. Documents relating to the involvement of the Agency and/or EU member states and/or other EU bodies in the negotiation, promotion, abolition or adoption of any laws or frameworks that seek to regulate the deployment of the UN goTravel software in a specific country.** The involvement mentioned in the previous sentence should include, but not be limited to, any legal and/or technical assistance provided by the Agency and/or EU member states and/or other EU bodies, such as observations, remarks, case-studies, legal assessments, risk assessments, policy briefs, policy positions, statistics, public consultation documents, country positions, Agency positions, recommendations, communications and emails, notes, minutes and meeting documents, impact assessments, audits and evaluation documents.

### **Clarifications**

- (i) For the purposes of this request, documents shall include but not be limited to: all official and unofficial, electronic and hard-copy documents, working arrangements, templates, databases, reports, studies, guidance or policy documents, reviews, minutes, statistics,

directives, instructions, circulars, service notes, contracts, agreements, receipts, audits, risk and impact assessments, statistics, forms, requests, letters, emails, decisions.

- (ii) Please provide all requested documents in English, and, if not possible, in French or German or Italian or Greek or Spanish.
- (iii) Please provide the documents in an electronic format to both [REDACTED] and [REDACTED]

If it is not possible to provide all the above documents, we would kindly ask you to advise on how to refine our request so as to ensure that it falls within the appropriate limits.

Please do not hesitate to contact us should you require any further clarifications.

Thank you very much for your consideration. We look forward to your response.

Yours faithfully,

**Ilia Siatitsa**  
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Privacy International  
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**Tomaso Falchetta**  
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