



Traceability and Verification System

# PRIVACY POLICY

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## Document control

Version	Date	Author	Changes
00.01	1 June 2023	A. Blecken	Initial draft of document
00.10	27 July 2023	Alexander Blecken	Document shared with Data Sharing Task Team, VTI Steering Committee and other stakeholders
00.19	18 October 2023	Alexander Blecken	Updated version including all comments and feedback received from Data Sharing Task Team, VTI Steering Committee and other stakeholders
00.20	22 November 2023	Alexander Blecken	Revised version shared with Data Sharing Task Team, VTI Steering Committee and other stakeholders
01.00	13 March 2024	Alexander Blecken	Final version
02.00	22 October 2025	Richard Wilder	Revised version based on input from EA signatories and further internal review

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# Introduction

The Traceability and Verification System (TRVST) is a digital platform developed through collaboration by a multi-stakeholder group called the Verification and Traceability Initiative (VTI). This platform enables countries to verify the authenticity of health products and improve end-to-end traceability across supply chains. TRVST is a powerful tool that significantly reduces the risks of falsified and diverted health products and supports the move toward national traceability of vaccines, medicines, and other health items.

TRVST is not intended to replace national traceability systems; instead, it functions as a global interoperability hub, connecting manufacturers, regulatory agencies, and national systems. The platform allows product verification where national systems are not yet established and supports traceability throughout the upstream supply chain before reaching the country level.

By design, TRVST facilitates compliance with regulations governing work of National Drug Regulatory Authorities (NDRAs) pertaining to product verification and by providing transparency into product logistics. Additionally, it grants access to patient information leaflets (PILs) via barcode scanning. This feature supplies healthcare providers with accurate, up-to-date product information, facilitating informed decisions regarding patient care. Patients can also use this feature to authenticate their medications and access essential information about the proper administration of their health products.

Manufacturers upload product master data, batch and lot numbers, expiry dates, and serial information into TRVST. These data are used to authenticate products when authorized users scan barcodes. Verification can be done directly through mobile or web interfaces or via data exchange between national systems and the TRVST Repository. The TRVST Repository acts as a central database that stores all product information and enables verification. This data exchange is managed through the TRVST Application Programming Interface (API), which facilitates secure communication and data sharing among systems.

Data sharing and security are core to TRVST's design. The platform complies with strict data governance and information security standards to protect the confidentiality, integrity, and availability of all exchanged data. These measures promote trusted collaboration among stakeholders while ensuring adherence to relevant data protection and privacy laws.

TRVST plays a crucial role in safeguarding the integrity of health supply chains, strengthening regulatory oversight, and enhancing patient safety.

The TRVST System Provider, responsible for the system's technical development and maintenance. UNICEF functions as the TRVST Organization and legal entity overseeing the management, governance, and stewardship of the data. This includes supervising system use, ensuring compliance with regulations, and managing the data shared on the platform.

More general information on TRVST is available in the [TRVST document repository](#).

# Privacy Policy

## What does this Privacy Policy cover?

Taking care of your information is important to us. This Privacy Policy sets out how we collect, use and store your personal information on the TRVST website and TRVST system (including the TRVST Dashboard as well as TRVST App) and what steps we take to protect your information.

It applies to the TRVST website and TRVST system. Organizations participating in TRVST may provide their own applications accessing the TRVST Hub and those will generally have their own specific privacy policy.

Please read our Privacy Policy carefully before using our site and app and refer back to it regularly to check for updates. Remember, this Privacy Policy will govern the way in which we collect and use your personal information from the moment you start visiting or using our sites.

## What does this Privacy Policy NOT cover?

You should note that through our site you may reach or be directed to other sites that relate to TRVST, such as the sites of organizations participating in TRVST. All those sites have their own privacy policies.

Please be aware that this Privacy Policy does not apply to other non-TRVST websites that may be linked through our site or to any collection of your personal information after you click on links to such other sites. The inclusion of a link in any of our sites to other sites does not imply endorsement by UNICEF or VTI of the linked site or of those sites' privacy policies.

### What is Personal Information?

For the purposes of this Privacy Policy, "personal information" is any information that enables us to identify you, directly or indirectly, by reference to any identifiers such as your name, address, phone number, email address, identification number, location data, online identifier - or one or more other factors specific to you as an individual that would allow us to identify you.

### In brief: How do we protect your personal information?

We will only use your personal information for the purposes described in this Policy and for no other purpose.

We will not sell your personal information.

We will not keep your personal information for longer than is necessary for the stated purposes except to the extent required by applicable regulations.

We will take all reasonable and necessary technical and organizational measures to protect your personal information.

## What personal information do we collect from you?

Depending on how you interact with us, the personal information that we collect may include your name, professional email address, and telephone or mobile number. We may combine this information with information we gather during your general browsing from standard server logs (such as your IP (Internet Protocol) address, domain name, browser type, operating system, and information such as the web site

that referred you to us, the files you downloaded, the pages you visit, and the dates/times of those visits). Also we do collect geo-location during the scanning activities.

## How do we use your personal information?

We may use your personal information:

### **To communicate with you**

If you have reached out to us with a question or feedback, we may communicate with you to respond to that question or feedback. We may communicate with you to provide you with access and use of the services you have requested such as creation or management of a TRVST user account.

### **To protect our legal rights**

We may use your personal information to enforce our Terms of Use, to defend our legal rights, and to comply with our legal obligations and policies.

### **For statistical analyses**

We may de-identify (i.e., anonymize) and aggregate information collected through our sites for statistical analyses and other legitimate purposes, including for research studies.

## Do we share your personal information?

We may share your personal information with the TRVST Service Provider for the TRVST system. They will only use your Personal Information for the purposes set out in the Section above.

We will only share your personal information with TRVST Service Provider as long as if they provide sufficient guarantees that your personal information will be protected and kept secure, including in cases where those third parties are located in countries outside your country of residence. We will also take reasonable steps to ensure that the means of transfer of your personal information provide adequate safeguards.

We promise to always keep your details safe, and we'll never sell or swap your personal information with any other organization.

## How can you control your personal information?

You can request more information about how we hold and use your information or make any other request in relation to your personal information, including withdrawing your permission to use your personal information, by contacting the TRVST Project Manager.

## How long do we keep your personal information?

We will only use and store your personal information for so long as it is required for the purposes it was collected for. How long personal information will be stored depends on the personal information in question and what it is being used for, as well as whether there is any administrative or regulatory requirement for retaining the personal information. For example, we retain your personal information as long as necessary to comply with our obligations, including our obligations to you, to address any request by you (including to administer your account), or to enforce our rights.

## How do we keep your information secure?

We have systems in place that comply with reasonable commercial standards of technology and operational security to protect all personal data provided by individuals from loss, misuse and unauthorized access, disclosure, alteration or destruction. Only authorized personnel, who have been made appropriately aware of their privacy obligations, are provided access to personal information.

## Cookies

The TRVST website uses cookies to provide statistics that help us to give you the best experience of our sites. You can switch them off if you prefer. However, by continuing to use our sites without changing settings, you are agreeing to our use of cookies.