

PRIVACY STATEMENT

Unit/Team	Executive Director/ IT team
Last update	22-10-2025

Use of Microsoft Copilot Chat

Context

AMLA (the Anti-Money Laundering Authority) processes personal data in accordance with Regulation (EU) 2018/1725 (EUI DPR). In line with Articles 15 and 16 of the EUI DPR, AMLA provides this privacy statement to inform data subjects about how their data is processed when using Microsoft Copilot Chat in Work mode.

The use of Microsoft Copilot is aligned with the strategic and operational objectives of AMLA as defined in Regulation (EU) 2024/1620. While the Regulation does not explicitly mandate the use of artificial intelligence, it provides a clear legal and functional basis for the adoption of innovative digital tools to support AMLA's mission. AMLA's mission involves:

- Coordinating national AML/CFT authorities
- Ensuring consistent application of EU rules
- Managing cross-border supervisory tasks.

These tasks require high-volume document handling, analysis, and reporting, which AI tools like Copilot can support efficiently, especially when human resources are not yet fully deployed in the starting-up phase of AMLA. This use is not a replacement for human oversight, but a strategic augmentation to meet regulatory deadlines and operational expectations.

The Controller for this processing activity is the ED/IT Team and can be reached out at ict-support@amla.europa.eu.

Purpose of the Processing

The purpose of the processing is to support AMLA staff in performing operational tasks such as:

- Translating and rephrasing text
- Drafting emails and letters
- Writing reports and briefing notes
- Summarising long documents
- Preparing meeting minutes and action items
- Performing data analysis and creating visualisations
- Developing or reviewing code (where appropriate)

While the tool is not intended to process personal data, incidental processing may occur through user-generated prompts or references to publicly available personal data. The processing serves AMLA's public interest mandate under Regulation (EU) 2024/1620 and is limited to productivity enhancement.

Controller and Contact Details

AMLA is the controller for the data processing activities described in this privacy statement. You may contact AMLA via email at ict-administration@amla.europa.eu or by post at: 5 MesseTurm, Friedrich-Ebert-Anlage 49, 60308 Frankfurt am Main, Germany

Categories of Personal Data

Categories of personal data that may be processed include

Input and session context

- Query text (user prompts), which can contain: Names and roles, Dates and locations, Publicly available personal data
- Conversation context (previous prompts and responses in the same session)
- Session identifiers (temporary tokens linking user input to session)

Operational/Usage Telemetry

- Request metadata (timestamp, message length, processing duration)
- Error handling data (error codes, exception logs)
- Message routing metrics (latency, queue usage)

Aggregate and Anonymized Analytics

- Pattern analysis for latency/error improvement (Frequency of summarisation prompts)
- High-level usage statistics (Number of prompts per user per day , anonymized)

Legal Basis

The processing is based on Article 5(1)(a) of Regulation (EU) 2018/1725:

Processing is necessary for the performance of a task carried out in the public interest.

Data Retention

Microsoft stores Copilot interaction data (prompts, responses, citations) in the user's interaction history.

Users can delete this history via the My Account portal. Copilot does not retain personal data beyond what is stored in the Microsoft 365 environment.

Recipients

Microsoft 365 Copilot stores and processes data within the EU Data Boundary for qualifying customers, hence your data or the personal data that may be inputted in the prompts is at Microsoft. This may entail international data transfers which are covered under the EU-US Privacy Framework as an adequacy decision, plus additional contractual clauses that the EU Commission has negotiated and to which AMLA adheres.

- Data at rest and in transit is encrypted
- Prompts and responses are not used to train foundation models
- OpenAI has no access to customer data
- Web search queries (if enabled) are disassociated from user and tenant identifiers

Data Subject Rights

Data subjects have the right to Access their data, Rectify inaccurate data, Erase, restrict the processing of your personal data or where applicable, the right to object to processing or the right to data portability under Articles 18–23 of the EUI DPR. There is no automated decision-making conducted with this technology, including profiling. When personal data is processed, the data comes from the user which may be generated by Microsoft itself. Other sources may be open sources, as depending on the prompt, Copilot may search open sources and process personal data available therein.

Requests can be submitted to ict-administration@amla.europa.eu or to dpo@amla.europa.eu.

Right to Lodge a Complaint

Data subjects also have the right to lodge a complaint with the European Data Protection Supervisor.