

RECORD OF PROCESSING ACTIVITIES

SURVEY ON CENTRAL CONTACT POINTS PURSUANT TO ARTICLE 45 (9) AMLD AND DELEGATED REGULATION (EU) 2018/1108

1. PROCESSING PARTIES

1.1 CONTROLLER NAME

Authority for Anti-Money Laundering Authority and
Countering the Financing of Terrorism (AMLA)
MesseTurm
Friedrich-Ebert-Anlage 49
60308 Frankfurt am Main
Germany

RESPONSIBLE UNIT

Supervisory policy Team;
contact: Supervisory.policy@amla.europa.eu

1.2 DATA PROTECTION OFFICER name

AMLA DPO

CONTACT DETAILS

dpo@amla.europa.eu

1.3 PROCESSOR NAME (IF APPLICABLE)

EU COM – EU Survey
EU COM also acts as Controller for EU Login, the
authentication tool to use EU Survey

CONTACT DETAILS

For EU Survey (EU COM)
<https://ec.europa.eu/eusurvey/home/support>
EU COM DPO DATA-PROTECTION-OFFICER@ec.europa.eu
<https://privacyrequest.cisco.com/>

1.4 JOINT CONTROLLERS NAME (IF APPLICABLE)

N/A

CONTACT DETAILS

N/A

2. PROCESSING ACTIVITY

2.1 NAME OF THE ACTIVITY

Survey on Central Contact Points pursuant Article 45 (9) AMLD and Delegated Regulation (EU) 2018/1108 AMLAR

2.2 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The purpose of the processing activity is to conduct preparatory work on the future Regulatory Technical Standard (RTS) on Central Contact Points (CCPs) pursuant to Article 41(2) of Directive (EU) 2024/1640. The questionnaire seeks to gather the industry and the NCA's perspective on the implementation and practical application of the current CCP framework under Article 45(9) AMLD and Commission Delegated Regulation (EU) 2018/1108. Where respondents provide consent, their contact information may be processed for the purpose of potential follow-ups regarding the survey.

2.3 OTHER PURPOSES

N/A

2.4 LEGAL BASIS

Choose applicable as per
Article 5(1) of Reg. (EU)
2018/1725:

Check
(YES/NO)

Art. 5(1)(a) For the performance of a task carried out in public interest or under AMLA Regulation	☒ / ☐	Please name the task: Art 6(2)(a) AMLAR
Art. 5(1)(b) For complying with a legal obligation upon the Unit/Authority	☐ / ☒	Please specify the legal obligation: N/A
Art. 5(1)(c) For contractual reasons of the Data Subject	☐ / ☒	N/A
Art. 5(1)(d) The Data Subject has given consent for one (or more) purposes as listed above	☒ / ☐	You have a right to withdraw this consent at any time. Your consent withdrawal will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, AMLA may not be able to process your response and will exclude it from the survey results.
Art. 5(1)(e) For protecting the vital interests of the data subject	☐ / ☒	Please specify: N/A

2.5 NECESSITY OF THE PROCESSING OF PERSONAL DATA

The information collected will support AMLA in assessing the effectiveness of the existing framework and identifying areas where further clarification or improvements may be needed in the future RTS pursuant Article 41(2) of Directive (EU) 2024/1640. In addition, should the responses require further actions to clarify these, AMLA may convene either specific questions to individual respondents or a round table, in order to gather more feedback for a better drafting of the future RTS.

2.6 DATA SUBJECTS

☐ Staff (TA/CA) ☐ SNEs ☐ Trainees ☐ Outsourced personnel	☒ Member States/ Competent authorities contacts Selected contact persons of the AMLA-members and representatives of Obligated Entities being Electronic Money institutions and Answer Payment Service providers ☐ Other contacts (please specify) ☐ Other (please specify)
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2.7 CATEGORIES OF PERSONAL DATA

☐ Name ☐ Surname ☐ Place/Date of Birth ☐ Gender ☒ Country of Work (not necessarily nationality) ☐ ID Card/Passport Number/ Personal Number	☒ Communication Data (Email Account, Telephone Number, Address Work or Personal - please specify) Email, IP address/Device ID, duration of the browsing session ☐ Title, Function (please specify) ☐ Financial information (Bank Account or Others – please specify) ☐ Bio ☐ CV ☐ Location ☐ Others
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☐ Picture

2.8 DATA RETENTION

Data category *Time limit*

Technical data (Device ID and IP address, duration)

Only retained by COM (EU Survey) as processor for the time of answering the survey

Personal data

Personal data collected through the survey will be retained until the completion and publication of AMLA's report assessing the implementation and practical application of the framework pursuant 45(9) AMLD and Commission Delegated Regulation (EU) 2018/1108.

3. DISCLOSURE OF PERSONAL DATA - RECIPIENTS WHERE PERSONAL DATA IS DISCLOSED

3.1 INTERNAL UNITS

(Please list all internal entities to whom the data will be disclosed):

Supervisory Policy Unit, Indirect Supervision and Oversight Unit

3.2 MEMBER STATES AUTHORITIES OR THIRD PARTIES (i.e.: private sector) WITHIN THE EU

3.3 THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

(If this is the case, please document the additional safeguards in compliance with Art. 48 of the DPR):

4. PRIVACY STATEMENT/ DATA PROTECTION NOTICE

FOR MORE INFORMATION INCLUDING HOW TO EXERCISE YOUR RIGHTS TO ACCESS, RECTIFICATION, OBJECT AND DATA PORTABILITY (WHERE APPLICABLE).
FOR DRAFTING OF THE PRIVACY STATEMENT, PLEASE FOLLOW ART. 15-16 OF THE DPR.

4.1 Please insert a link if available, or the text of the Privacy Statement:

Available on the Survey page

4.2 Please explain how you intend to provide the Privacy Statement to the Data Subjects (i.e. via email, teams, Website, etc.):

The PS will be placed on the survey

5. DATA SECURITY

5.1 ORGANISATIONAL MEASURES

EU Survey stores the EU Login username as well as e-mail addresses of the survey owners at the Data Centre of the European Commission.

The European Commission has implemented security measures to protect server hardware, software and the network from accidental or malicious manipulations and loss of data. All data is stored on European Commission servers managed by DG DIGIT in line with the technical security provisions laid down in the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission, its subsequent versions, its implementing rules (as adapted from time to time) and the corresponding security standards and guidelines, as well as the Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on the security in the Commission, its implementing rules and the corresponding security notices. These documents (as adapted from time to time) are available for consultation at the following address: https://ec.europa.eu/info/publications/security-standards-applying-all-european-commission-information-systems_en . Additionally, the personal data will be stored internally in the AMLA IT environment once extracted.

5.2 TECHNICAL MEASURES

	Check (YES/NO)	Description (if YES)
Pseudonymisation or Encryption	☒ /□	
Measures to ensure:		
– Confidentiality of Data	☒ /□	
– Integrity of Data	☒ /□	
– Availability of Data	☒ /□	
Resilience of Systems and Services	☒ /□	
Restoration of availability and access to Personal Data in a timely manner	☒ /□	
Process for testing, assessing and evaluation of the effectiveness the measures	□/☒	