

RECORD OF PROCESSING ACTIVITIES

PERSONAL DATA PROCESSING OPERATIONS WITHIN THE SEDIA CORPORATE INITIATIVE

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 Finance & Procurement
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1.2 DATA PROTECTION OFFICER name DPO	CONTACT DETAILS dpo@amla.europa.eu
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1.3 PROCESSOR NAME (IF APPLICABLE) Click or tap here to enter text.	CONTACT DETAILS Click or tap here to enter text.
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1.4 JOINT CONTROLLERS NAME (IF APPLICABLE) List-of-joint-controllers_en.pdf	CONTACT DETAILS Click or tap here to enter text.
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2. PROCESSING ACTIVITY

2.1 NAME OF THE ACTIVITY
Personal Data Processing operations within the SEDIA Corporate Initiative between the European Commission and the European Union institutions, bodies, offices, and agencies, and further in the privacy statement published under the legal notice section of the EU Funding and Tenders Portal

2.2 PURPOSE OF THE PROCESSING OF PERSONAL DATA
Participant registration, assessment and validation management for the purpose of participation to EU grants, prizes, procurement and activities via the EU Funding & Tenders Portal (hereinafter 'Portal')

2.3 OTHER PURPOSES

[Click or tap here to enter text.](#)

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	<input checked="" type="checkbox"/>	<p><i>Please name the task:</i></p> <p>The processing is necessary: for the performance of a task carried out in the public interest or in the exercise of official authority</p>
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		vested in the Union institution or body (Article 5(1)(a) of Regulation) for the management and functioning of the Union Institutions or bodies (Recital (22) of the Regulation)
Art. 5(1)(b) For complying with a legal obligation upon the Unit/Authority	<input checked="" type="checkbox"/>	<p><i>Please specify the legal obligation:</i></p> <p>Processing is necessary for compliance with legal obligations related to procurement procedures, contract management, and financial verification, in accordance with the Regulation (EU, Euratom) 2024/2509 (Financial Regulation) , in particular:</p> <ul style="list-style-type: none"> • Title VII (Procurement), governing the organisation, publication, evaluation and award of procurement procedures; • provisions on budget implementation and internal control, requiring proper financial management, verification and documentation of expenditure; • provisions on accounting and record-keeping, requiring the retention of supporting documents and audit trails; • provisions on commitments and payments, requiring financial validation, verification and processing of invoices and contracts. <p>and any other applicable procurement rules.</p>
Art. 5(1)(c) For contractual reasons of the Data Subject	<input checked="" type="checkbox"/>	Processing necessary for compliance with legal obligations related to procurement procedures including the verification of exclusion and selection criteria and participant legal validation and financial capacity assessment, in accordance with Regulation (EU, Euratom) 2024/2509 (Financial Regulation) and applicable procurement rules.
Art. 5(1)(d) The Data Subject has given consent for one (or more) purposes as listed above	<input type="checkbox"/>	<p><i>Please explain how the consent is gathered:</i></p> <p>Click or tap here to enter text.</p>
Art. 5(1)(e) For protecting the vital interests of the data subject	<input type="checkbox"/>	<p><i>Please specify:</i></p> <p>Click or tap here to enter text.</p>

2.5 NECESSITY OF THE PROCESSING OF PERSONAL DATA

The purpose of the processing is the participant registration, assessment and validation of legal entities for the purpose of managing EU programmes, grants, prizes, procurement and activities via the EU Funding & Tenders Portal and the related processing operations undertaken by the Joint Controllers. This covers the following types of processes: (i) validation of legal entity existence and status (e.g. public / private, profit / not for profit, SME/MIDCAP, etc.) and any change to this status throughout the life cycle (e.g. universal takeovers, change of status); (ii) validation of Legal Entity Appointed Representative, (iii) preparation of financial capacity assessment, (iv) preparation of ownership and control assessment and (v) bank account related data management. This record covers also all internal and external checks, audits, investigations and other proceedings that users of public funds of European Union are subject to, to assess the legality and regularity of the transactions underlying the implementation of the European Union budget. The audit and control activities can be conducted at any time during the

performance of the programme / contract / project, as well as thereafter, and can concern any aspect, depending on the needs of the Joint Controller. The Joint Controllers may use limited personal data obtained through the Portal for the purposes of monitoring, evaluating, and improving their programmes and initiatives; to account for these in front of the legislative authorities (the European Parliament and the European Council); to comply with their public reporting obligations; and as a source of information for policymaking.

2.6 DATA SUBJECTS

- Staff (TA/CA)
- SNEs
- Trainees
- Outsourced personnel

- Member States/ Competent authorities contacts
- Other contacts (please specify) [Click or tap here to enter text.](#)
 - Other (please specify) Natural persons representing the Participants/Beneficiaries/Contractors vis-à-vis the EU Funding and Tenders Portal activities (essentially in grant and procurement procedures and the ensuing legal commitments management), notably as self-registrants, account administrators, Legal Entity Appointed Representatives, legal representatives, but also as third parties whose personal data is needed or embedded in the documents on the basis of which the validation / assessment takes place

2.7 CATEGORIES OF PERSONAL DATA

- Name
- Surname
- Place/Date of Birth
- Gender
- Nationality
- ID Card/Passport Number/ Personal Number
- Picture

- Communication Data (Email Account, Telephone Number, Address Work or Personal - please specify) (1) e-mail (2) contact (phone) numbers – including all types, such as: personal, business, GSM, landline, fax, voice over IP) (3) personal address(es) submitted (such as origin, permanent, current, previous residences)
- Title, Function (please specify) Function/position/employment status (such as for Legal Representative, Legal Entity Appointed Representative, a role in a governance structure of entity)
- Financial information (Bank Account or Others – please specify) (1) bank account related data (such as account number, name and address of the holder, name and address of the bank, available funds) (2) business, ownership and tax related data (such as revenues and patrimony, business/economic activity exercised on self-employed basis, number/value of shares or voting right held by natural persons or group of natural persons, social security contributions, VAT and other taxes paid, VAT number)
- Bio
- CV
 - Location
- Others (Cover letter, professional certificates, language certificates, motivation letters and the data categories that may be inserted in those documents)

2.8 DATA RETENTION

<i>Data category</i>	<i>Time limit</i>
For Participant who has been awarded a Legal Commitment	N+10 years
For Participant who has been awarded no Legal Commitment, but has submitted a proposal/tender	N+10 years
In any case – for all Participant profiles (including invalid self-registrants).	N+10 years.

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):

Finance and Procurement Unit

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

Within the European Union organisation (the Joint Controllers / the EUIBA), a recipient may be: (i) any legal person that is an EUIBA who works with the Portal processing operations covered by this privacy statement or is entitled by law and (ii) any legal or natural person who is in a contractual relationship with an EUIBA who works with the Portal processing operations covered by this privacy statement. Such as: staff of European Union institutions and bodies, external experts and staff of contractors [Click or tap here to enter text.](#)

Further specific disclosure: (iii) Specifically in the frame of procurement and grant management using Participant Register data: partner organisations chosen by participant and included in participant's grant or tender proposal (iv) In accordance with the Financial Regulation (particularly Article 38 et al), certain information on recipients of EU funds are published annually on the Europa webpage (Financial Transparency System: European Commission - Financial Transparency System; the Official Journal of the European Union and/or on the applicable website of the EUIBA) (v) pursuant to Article 3(13) of Regulation (EU) 2018/1725, public authorities which may receive personal data in the framework of a particular inquiry in accordance with European Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing. Disclosure to recipients is exercised in compliance with the principles of "necessity" and "data minimisation". The natural persons further abide by the statutory obligations, and when required, additional confidentiality agreements.

Outside the European Union organisation itself, a recipient may be: (i) any legal or natural person to whom EUIBA is under regulatory duty or who needs it in the public interest and the recipient needs it for legitimate performance of tasks within its competence. Such as: authorised persons representing EU Member States / EEA countries (and for associated countries if relevant for the programme) in various programming / legislative bodies (like programme committees, advisory groups, national authorities / agencies / contact points, etc.) and authorised persons representing industry in case of EU joint undertakings' operations, etc. (ii) any legal or natural person who has a contractual relationship with an EUIBA and who is working on behalf of and under the responsibility of the Joint-Controllers for the purposes of performing the tasks of the relevant contract or has a need-to-know stemming from the contract. Such as: staff of contractors acting as processors for a specific processing operation (auditor, event organiser) external auditors / contractors carrying out financial verifications, etc.

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):

[Click or tap here to enter text.](#)

4. PRIVACY STATEMENT/ DATA PROTECTION NOTICE

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

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.

For more information on the processing of your personal data, including the modalities for exercising your rights of access, rectification, restriction, objection, and data portability (where applicable), please refer to the Data Protection Notice available at: [EU Funding & Tenders Portal](#)

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

It is accessible online via the following link:

https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/ftp/privacy-statement-participant-data_layer2_en.pdf

A data subject can exercise his/her rights (Art 17-24 of the Regulation) by submitting a request concerning access, rectification, erasure, restriction or objection to processing of their personal data to the Controller (Article 14(3) of Regulation (EU) 2018/1725) to the dpo@amla.europa.eu

Further to the above, data subjects may contact the AMLA Data Protection Officer (DPO): dpo@amla.europa.eu or the data protection officer of the joint-controller specified in the [list-of-joint-controllers_en.pdf](#). In case of conflict, complaints can be addressed to the European Data Protection Supervisor: EDPS@edps.europa.eu

5. DATA SECURITY

5.1 ORGANISATIONAL MEASURES

Access to AMLA related personal data is restricted to authorised staff on a need-to-know basis; internal policies, training, segregation of duties, audit trails, and retention procedures are in place to ensure secure and compliant processing. AMLA as the joint processor manages who is authorised to access AMLA's sections.

5.2 TECHNICAL MEASURES

Check (YES)

Personal data are processed using secure IT systems with authentication controls, role-based access, encryption, logging, and backup mechanisms, ensuring confidentiality, integrity, and availability of the data.

Pseudonymisation or Encryption	<input checked="" type="checkbox"/>	The data is not pseudonymised. The information is encrypted in the database.
Measures to ensure:		
– Confidentiality of Data	<input checked="" type="checkbox"/>	Confidentiality of data is managed at two levels. Each joint processor has access only to part of the global data managed by the platform. The joint processor manages individual access to that part of data based on business needs. The full set of access rights and levels is described in tc_en.pdf section 2.3.
– Integrity of Data	<input type="checkbox"/>	Click or tap here to enter text.
– Availability of Data	<input checked="" type="checkbox"/>	The European Commission will take reasonable care to ensure the availability of the Portal as described in tc_en.pdf section 3.5.
Resilience of Systems and Services	<input type="checkbox"/>	Click or tap here to enter text.

Restoration of availability and access to Personal Data in a timely manner	<input checked="" type="checkbox"/>	Data subject rights are defined in Chapter III (Articles 14-25) of Regulation (EU) 2018/1725 as described in the privacy-statement_en.pdf . AMLA as joint controller is not directly responsible for the access of interested persons but can provide this link and other information on how to contact the data responsible persons.
Process for testing, assessing and evaluation of the effectiveness the measures	<input type="checkbox"/>	Click or tap here to enter text.