

# RECORD OF PROCESSING ACTIVITIES

## PROCUREMENT AND CONTRACT MANAGEMENT

### 1. PROCESSING PARTIES

#### 1.1 CONTROLLER NAME

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

#### RESPONSIBLE UNIT

Finance & Procurement team  
[procurement@amla.europa.eu](mailto:procurement@amla.europa.eu)

#### 1.2 DATA PROTECTION OFFICER name

DPO

#### CONTACT DETAILS

[dpo@amla.europa.eu](mailto:dpo@amla.europa.eu)

#### 1.3 PROCESSOR NAME (IF APPLICABLE)

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

#### CONTACT DETAILS

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

#### 1.4 JOINT CONTROLLERS NAME (IF APPLICABLE)

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

#### CONTACT DETAILS

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

### 2. PROCESSING ACTIVITY

#### 2.1 NAME OF THE ACTIVITY

Procurement and contract management

#### 2.2 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The purpose of the processing of personal data is the management and administration of procurement procedures, including the receipt and evaluation of tenders, communication with candidates and tenderers, the award of contracts, and the subsequent management and administration of the contract lifecycle, including communication with contractors.

#### 2.3 OTHER PURPOSES

No other purposes

If you are going to use the data for other purposes, please explain below:

[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)

<b>Art. 5(1)(a)</b> For the performance of a task carried out in public interest or under AMLA Regulation	<input type="checkbox"/> / <input type="checkbox"/>	Please name the task: <a href="#">Click or tap here to enter text.</a>
<b>Art. 5(1)(b)</b> For complying with a legal obligation upon the Unit/Authority	<input checked="" type="checkbox"/> / <input type="checkbox"/>	Please specify the legal obligation: Compliance with obligations under Regulation (EU, Euratom) 2024/2509, AMLA Financial Rules and internal rules concerning procurement, contract management, budget

		implementation, accounting, audit and record retention.
<b>Art. 5(1)(c)</b> For contractual reasons of the Data Subject	<input type="checkbox"/> / <input type="checkbox"/>	<a href="#">Click or tap here to enter text.</a>
<b>Art. 5(1)(d)</b> The Data Subject has given consent for one (or more) purposes as listed above	<input type="checkbox"/> / <input type="checkbox"/>	Please explain how the consent is gathered: <a href="#">Click or tap here to enter text.</a>
<b>Art. 5(1)(e)</b> For protecting the vital interests of the data subject	<input type="checkbox"/> / <input type="checkbox"/>	Please specify: <a href="#">Click or tap here to enter text.</a>

**2.5 NECESSITY OF THE PROCESSING OF PERSONAL DATA**

The need of the processing activity is the compliance with the public procurement law and regulations, as well as to ensure transparency, competition, equal treatment, proportionality and sound financial management.

**2.6 DATA SUBJECTS**

- |                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Staff (TA/CA)</li> <li><input type="checkbox"/> SNEs</li> <li><input type="checkbox"/> Trainees</li> <li><input type="checkbox"/> Outsourced personnel (i.e.: external experts)</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Member States/ Competent authorities contacts</li> <li><input type="checkbox"/> Other contacts (please specify) <a href="#">Click or tap here to enter text.</a></li> <li><input checked="" type="checkbox"/> Other (please specify) Contractors, tenderers, and their staff submitting offers or providing services/goods</li> </ul> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**2.7 CATEGORIES OF PERSONAL DATA**

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> General personal data: Identification details (first name, surname, education/training, employment history, financial/payment details, CV, Place/Date of Birth, Nationality, ID Card/Passport Number/ Personal Number, Picture, security</li> <li><input checked="" type="checkbox"/> Procurement Data: Technical offers, declarations, certificates, eligibility evidence, expertise, technical skills, languages, educational background, professional experience including details on current and past employment, test results, evaluation reports (any information specified in the procurement documents), etc.</li> <li><input checked="" type="checkbox"/> Information relating to eligibility or selection criteria e.g. declaration of honor, certificates for social security contributions and taxes paid, extract from judicial records, criminal records, evidence of payment of taxes, social security compliance</li> <li><input checked="" type="checkbox"/> Contract Execution Data: Contractual correspondence, invoices, performance reports, amendments</li> </ul> | <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Communication Data (Email Account, Telephone Number, Address Work or Personal, Title, Function</li> <li><input checked="" type="checkbox"/> Financial/legal information (Bank Account or Others – please specify) all of the above linked to the company, including power of attorneys, etc.</li> <li><input checked="" type="checkbox"/> Goods/services provided</li> </ul> |
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**2.8 DATA RETENTION**

<i>Data category</i>	<i>Time limit</i>
Personal data from successful tenderers are kept by the procurement team in the electronic archives	for a period of ten (10) years following the budget discharge of the year when the contract or the framework agreement terminates
Personal data from unsuccessful tenderers are kept by the procurement team in the electronic archives	for five (5) years following the signature of the contract with the awarded tenderer(s)

Criminal records extracts (requested only to awarded tenderers) are kept by the procurement team in the electronic archives	for two (2) years following the signature of the contract with awarded tenderers
For procurement contracts and framework contracts, personal data written on them and acquired during the management of the contract are kept by the responsible for the contract in the electronic archives	for a period of ten (10) years following the budget discharge of the year when the contract or the framework contract terminates
For the purpose of a possible audit, the above-mentioned personal data are kept until the end of such audit if started before the end of the above retention periods	

### 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):*

Procurement, opening and evaluation committees

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

EU institutions (auditors, regulators, OLAF, European Court of Auditors, EDPS)

#### 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

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:

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

#### 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 made available together with the procurement documents and can also be accessed on our website

### 5. DATA SECURITY

#### 5.1 ORGANISATIONAL MEASURES

Access to personal data is restricted to authorised staff on a strict need-to-know basis. Only individual staff members involved in the relevant procurement procedure or contract management activities have access to such data, and solely for purposes directly related to their duties.

Appropriate organisational measures are in place to ensure secure and compliant processing, including internal policies and procedures, staff training, segregation of duties, audit trails and defined retention rules.

Personal data are processed within the European Commission's secure IT environment, including systems and tools such as eProcurement modules, ABAC, SUMMA, and ARES.

#### 5.2 TECHNICAL MEASURES

	<i>Check (YES/NO)</i>	<i>Description (if YES)</i>
Pseudonymisation or Encryption	<input checked="" type="checkbox"/> /□	Data stored encrypted in the applications used during the process (eProcurement, ABAC, SUMMA and ARES). Those are web tools using https protocol for access.
Measures to ensure:		
– Confidentiality of Data	<input checked="" type="checkbox"/> /□	Access to data restricted to specific persons within the EC environment, including AMLA, having received specific permission. Specifically, AMLA decides on the AMLA users that have access to the tool based on assigned roles and business needs. Access to tools as ARES for external stakeholders is limited to external auditors upon request by AMLA DMO to the unit in charge of the application.
– Integrity of Data	<input checked="" type="checkbox"/> /□	Data is saved in databases linked to the applications. Those applications are hosted and managed within a secure IT environment of the European Commission that includes measures to ensure the integrity and availability of the data.
– Availability of Data	<input checked="" type="checkbox"/> /□	Access to data is available to identified users based on roles or having received access rights to the specific procurement or contract procedure.
Resilience of Systems and Services	<input type="checkbox"/> /□	<a href="#">Click or tap here to enter text.</a>
Restoration of availability and access to Personal Data in a timely manner	<input type="checkbox"/> /□	<a href="#">Click or tap here to enter text.</a>
Process for testing, assessing and evaluation of the effectiveness the measures	<input type="checkbox"/> /□	<a href="#">Click or tap here to enter text.</a>